

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS KINGSLEY  
(UPS/USPS-T10-23 and 31)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T10-23 and 31, filed on March 21, 2000, and redirected from witness Kingsley. An objection was filed on March 31, 2000 to UPS/USPS-T10-31 (partial) and other interrogatories in that set. The Postal Service and United Parcel Service are attempting to arrive at a compromise concerning these objections.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 10, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF UNITED PARCEL SERVICE  
(Redirected from witness Kingsley, USPS-T-10)**

**USP/USPS-T10-23.** Refer to USPS-LR-I-176, page 4, which states: "We found that USPS customers often failed to complete the following items in section one, mailer information, of PS Form 8125 . . . . (footnote omitted).

(a) Provide the number of PS Forms 8125 that did not indicate the "class of mail and product name."

(b) Provide the number of PS Forms 8125 that did not provide "processing and category and entry discounts."

**RESPONSE:**

It is the Postal Service's understanding that the audit examined the individual forms, noting deficiencies in the completion of various items without attempting to correlate those deficiencies with actual deficiencies in the handling of the mail or the payment of postage. It should also be noted that information not contained in various items on the forms may have been available from elsewhere on the form or from other sources. With those caveats, the following information is provided for those mailers using the proper PS Form 8125, which was the July 1998 edition.

(a) Twenty-two (22) PS Forms 8125 did not indicate the "class of mail and product name."

(b) Four (4) PS Forms 8125 did not indicate "processing and category and entry discounts."

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**UPS/USPS-T10-31. How many facilities in total were visited in performing the audit that is the subject of USPS-LR-I-176, and what percentage of all eligible facilities does that number represented?**

**Response:**

Partial objection filed on March 31, 2000. As indicated on page 3 of the audit report contained in USPS-LR-I-176, three sites were visited. As further indicated on page 3, footnote 6, those sites were Memphis, Tennessee; Minneapolis, Minnesota; and Keamy, New Jersey.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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