

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

APR 14 4 39 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

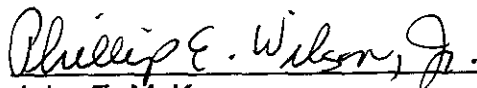
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-14 through 15)
(April 14, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves these interrogatories directed to United States Postal Service: UPS/USPS-14 through 15.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe L.L.P.
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE

UPS/USPS-14. Refer to USPS-LR-I-279. Provide the supporting documentation for this study including, but not limited to, the following:

- (a) The PERMIT System raw data extracts for PQ2, FY1997, which formed the basis for the study;
- (b) The program or other algorithm used to select the 236 sampled transactions;
- (c) The postage statements reviewed to test the 219 of the 236 transactions which were able to be tested;
- (d) Document(s) which identify the verification procedure(s) that were performed on the 219 transactions and the conclusion(s) for each transaction, including those transactions which were assigned "inappropriate VIP codes"; and
- (e) The postage statements reviewed to test the 50 "judgmentally selected" transactions from Bulk Mail facilities in the Washington, D.C., metropolitan area.

UPS/USPS-15. Refer to USPS-LR-I-279.

- (a) What accounting firm performed this study?
- (b) Why were Bulk Mail Facilities selected for the 50 "judgmentally selected" transactions limited to the Washington, D.C., metropolitan area?
- (c) Confirm that Parcel Post was sampled at the same rate as all other classes or subclasses of mail "utilized less frequently than the six mail line items (mail classes) that comprise the majority of Postal Service revenue."

1

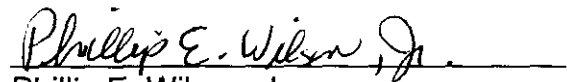
INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE

(d) Confirm that the study observed instances of postage statements with "inappropriate VIP codes."

(e) Confirm that Postal Service management had concerns that "Bulk Mail technicians (or users of PERMIT) may not be as familiar with the proper classification of mail for these less frequently utilized mail classes" including Parcel Post. If not confirmed, explain in full.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.


Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: April 14, 2000
Philadelphia, Pa.

61635