

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
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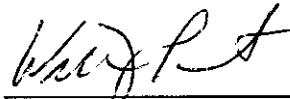
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-19 through 35)
(April 20, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves these interrogatories directed to United States Postal Service: UPS/USPS-19 through 35.

Respectfully submitted,



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Of Counsel.

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UPS/USPS-19. Provide a copy of Handbook M-22, Dispatch and Routing Policies.

UPS/USPS-20. Using PETE data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

UPS/USPS-21. Using PETE data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-22. Using ODIS data, provide the number of Priority Mail pieces for FY1999:

- (a) that arrived at the destination office within one day;
- (b) that arrived at the destination office within two days;
- (c) that arrived at the destination office within three days;
- (d) that arrived at the destination office within four days; and
- (e) that took more than four days to arrive at the destination office.

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UPS/USPS-23. Using ODIS data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-24. Using Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

UPS/USPS-25. Using Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-26. Using any available data other than ODIS, PETE, or Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;

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- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

UPS/USPS-27. Using any available data other than ODIS, PETE, or Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-28 Using ODIS data, provide the number of First Class Mail pieces for FY1999:

- (a) that arrived at the destination office within one day;
- (b) that arrived at the destination office within two days;
- (c) that arrived at the destination office within three days; and
- (d) that arrived at the destination office within four days;
- (e) that took more than four days to arrive at the destination office.

UPS/USPS-29. Using ODIS data, provide the number of First Class Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

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UPS/USPS-30. Using EXFC data, provide the number of First Class Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

UPS/USPS-31. Using EXFC data, provide the number of First Class Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-32. Using any available data other than ODIS or EXFC data, provide the number of First Class Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

UPS/USPS-33. Using any available data other than ODIS or EXFC data, provide the number of First Class Mail pieces for FY1999:

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- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-34. Refer to the Postal Service's answer to UPS/USPS-T10-23(a) and (b) (redirected from witness Kingsley):

(a) Provide the number of all PS Forms 8125 for all mailers, whether or not the mailer "us[ed] the proper PS Form 8125," that "did not indicate the 'class of mail and product name.'"

(b) Provide the number of all PS Forms 8125 for all mailers, whether or not the mailer "us[ed] the proper PS Form 8125," that "did not indicate the 'processing and category and entry discounts.'"

(c) How many "proper" PS Forms 8125 were examined in the audit?

(d) How many PS Forms 8125, whether or not the form was a "proper" PS Form 8125, were examined in the audit?

UPS/USPS-35. This question refers to the underlying information that forms the basis for the PERMIT System database and, ultimately, the Bulk RPW database. Is postage statement-level data for Parcel Post for FY1998 available in electronic format at one centralized location? If not, provide the number of facilities where postage statement-level Parcel Post data for FY1998 is kept in electronic format, and state the minimum number of such facilities that would have to provide such data in order to

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have a complete database, at the postage statement-level, of all Parcel Post postage statements in electronic format for FY1998.

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.



William J. Pinamont
Attorney for United Parcel Service

Dated: April 20, 2000
Philadelphia, Pa.

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