

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

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DOCKET NO. R2000-1

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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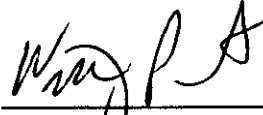
MOTION OF UNITED PARCEL SERVICE TO COMPEL  
PRODUCTION OF INFORMATION REQUESTED  
IN INTERROGATORIES  
UPS/USPS-T13-10-14 TO WITNESS RAYMOND  
(April 21, 2000)

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Pursuant to Sections 26(d) and 27(d) of the Commission's Rules of Practice, United Parcel Service ("UPS") hereby moves the Presiding Officer to order the United States Postal Service ("Postal Service") to answer interrogatories UPS/USPS-T13-10-14, filed on March 22, 2000. A copy of these interrogatories is attached hereto as Attachment A. Answers to these interrogatories were due on April 5, 2000, sixteen days ago. However, the Postal Service has not yet responded to these interrogatories despite the fact that UPS has contacted counsel for the Postal Service in an effort to obtain responses.

WHEREFORE, United Parcel Service respectfully requests that the Postal Service be ordered to answer interrogatories UPS/USPS-T13-10-14 to Postal Service witness Raymond.

Respectfully submitted,



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William J. Pinamont  
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3400 Two Logan Square  
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and

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

Of Counsel.

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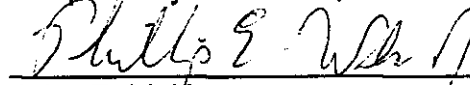
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INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS RAYMOND  
(UPS/USPS-T13-10 through 14)  
(March 22, 2000)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Raymond: UPS/USPS-T13-10 through 14.

Respectfully submitted,



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John E. McKeever  
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3400 Two Logan Square  
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Of Counsel.

**INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS FROM UNITED PARCEL SERVICE TO  
UNITED STATES POSTAL SERVICE WITNESS RAYMOND**

UPS/USPS-T13-10. Provide a definition of "parcel," including size, cubic volume, and class of mail (if applicable), as used in the Engineered Standards Database. Provide supporting materials for your definition, such as training manuals or any other documentation.

UPS/USPS-T13-11. How does the carrier decide if a parcel is going to be a deviation parcel delivery?

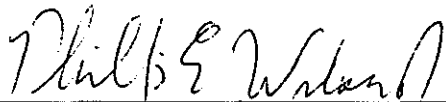
UPS/USPS-T13-12. Describe any standards, criteria, or guidelines with respect to weight and/or cubic volume of a parcel(s) regarding when a carrier should make a deviation delivery. If these are written, provide a copy of them.

UPS/USPS-T13-13. What are the guidelines in regard to size or shape for a deviation parcel delivery? If there are written guidelines, provide a copy of them.

UPS/USPS-T13-14. In the initial survey design for the Engineered Standards project, were there discussions of "deviation" delivery runs for parcels? If so, provide any notes, memoranda, or other documentation that includes these discussions.

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: March 22, 2000  
Philadelphia, Pa.

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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.



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William J. Pinamont  
Attorney for United Parcel Service

Dated: April 21, 2000  
Philadelphia, Pa.

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