

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000 :

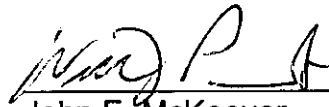
DOCKET NO. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE
(UPS/USPS-36)
(April 24, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves this interrogatory directed to United States Postal Service: UPS/USPS-36.

Respectfully submitted,



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INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE

UPS/USPS-36. Refer to the response to Presiding Officer's Information Request No. 6, Question 9, filed April 14, 2000. That question requested information on the extent to which First Class Mail was delivered as fast or faster than Priority Mail for any of the 85 performance clusters in the PETE system and asked for a detailed explanation of how the analysis was performed. The response contains a table that purports to compare "destination cluster performance in EXFC and PETE for overnight committed Priority Mail." It does not explain how the analysis was done or how "destination cluster performance" was measured or what that means.

(a) Explain what "destination cluster performance" means and how it was measured.

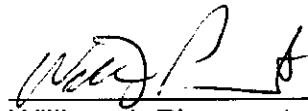
(b) What was the test for determining whether performance was better in EXFC or in PETE?

(c) Did the determination of whether performance was "better" depend on the extent to which the mail involved met its stated service standard, or whether EXFC MAIL arrived faster in terms of days from collection to delivery than PETE mail or vice versa, without regard to the stated service standard?

(d) Provide the results of the requested comparison for all EXFC and PETE mail, not just for "overnight committed Priority Mail."

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 24, 2000
Philadelphia, Pa.