

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

MOTION OF UNITED PARCEL SERVICE TO COMPEL
PRODUCTION OF INFORMATION REQUESTED
IN INTERROGATORIES UPS/USPS-16 AND 17
(May 11, 2000)

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-16-17, filed on April 18, 2000. A copy of these interrogatories is attached hereto as Attachment A. Answers to these interrogatories were due on May 2, 2000. The Postal Service has not objected to these interrogatories nor has it filed answers.

Interrogatory UPS/USPS-16 requests the number of carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side) for year-end FY1998 and FY1999. Interrogatory UPS/USPS-17 requests an estimated projection of the number of city carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side) for year-end FY2000 and FY2001.

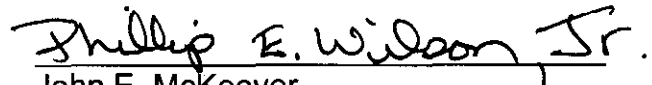
This information is fundamental to a thorough evaluation of the Postal Service's distribution of city carrier costs to the various categories of mail. How? A delay in discovery relating to the city carrier costs estimates at this late stage in the proceedings

impairs UPS's ability to evaluate the Postal Service's proposals regarding cost for Parcel Post and other mail categories and thus prepare its case-in-chief and its rebuttal to the cases-in-chief of other participants.

The Commission's Rules clearly establish that objections to discovery requests are due within 10 days of service and answers to discovery requests are due within 14 days of service. 39 C.F.R. §§ 3001.26(c), 3001.27(c). The Postal Service has failed to do either in a timely manner and therefore should be ordered to answer these interrogatories.

WHEREFORE, United Parcel Service respectfully requests that the Postal Service be ordered to answer interrogatories UPS/USPS-16 and 17.

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE

UPS/USPS-16. For year-end FY1998 and FY1999, provide the number of routes for city carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side). If the exact information is not available, provide an estimate.

UPS/USPS-17. For year-end FY2000 and FY2001, provide an estimated projection of the number of routes for city carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side).

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

Dated: May 11, 2000
Philadelphia, Pa.

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