

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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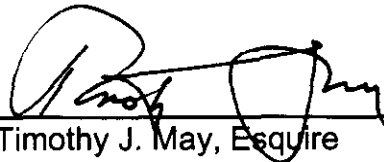
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

**PARCEL SHIPPERS ASSOCIATION (PSA) FOLLOW-UP
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
UNITED PARCEL SERVICE (PSA/UPS-1-7-8)**

The Parcel Shippers Association (PSA) requests United Parcel Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



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Dated: July 5, 2000

**PARCEL SHIPPERS ASSOCIATION FOLLOW-UP INTERROGATORIES
TO UNITED PARCEL SERVICE**

PSA/UPS-T-7

In response to PSA/UPS-T6-6, filed on June 27, 2000, UPS witness Sappington responded that he did not know the delivery performance of United Parcel Service and therefore he was not able to compare USPS Parcel Post delivery service with United Parcel Service's delivery performance. Please provide the delivery standards for United Parcel Service ground parcel delivery service, and provide the data which measures the UPS achievement of its standards.

PSA/UPS-T-8

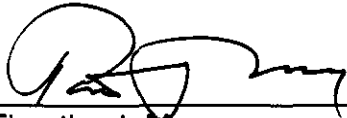
UPS witness Sappington responded to PSA/UPS-T-6-9, which asked him to compare the growth of United Parcel Service ground parcel shipments during the 1990s, the period in which witness Sappington said that Parcel Post volumes had grown substantially, with Parcel Post growth. Witness Sappington in effect said he had no information about United Parcel Service's share of the market in that period nor its volume growth. Please supply the information requested of UPS witness Sappington in that interrogatory.

PSA/UPS-T6-9

Witness Sappington responded to PSA/UPS-T-6-10 by stating that he could not compare Parcel Post performance of the standards defining value of service with UPS' performance of those standards because he had no data "...on the performance and internal operations of private competitors...." Please provide the information on UPS performance requested in PSA/UPS-T-6-10 9b).

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



Timothy J. May

Dated: July 5, 2000