

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

OBJECTION OF UNITED PARCEL SERVICE TO
PARCEL SHIPPERS ASSOCIATION
INTERROGATORIES PSA/UPS-7 (in part), 8, and 9 (in part)
(July 17, 2000)

United Parcel Service ("UPS") hereby objects to Parcel Shippers Association Interrogatories PSA/UPS-7 (in part), 8, and 9 (in part), on the grounds stated herein.

interrogatory PSA/UPS-7 requests that UPS "provide the delivery standards for United Parcel Service ground parcel delivery service, and provide the data which measures the UPS achievement of its standards." UPS will respond to this interrogatory to the extent that it asks for UPS's delivery standards. However, UPS objects to the request for information regarding its achievement of those service standards for "ground parcel delivery service" because the interrogatory is unduly vague, the requested information is not relevant to the issues in this proceeding, and it is commercially sensitive.

Interrogatory PSA/UPS-8 requests that UPS "compare the growth of United Parcel Service ground parcel shipments during the 1990s . . . with Parcel Post growth." The interrogatory's reference to "ground parcel shipments" is unduly vague. If the request is for the volume of shipments moving by ground transportation, see

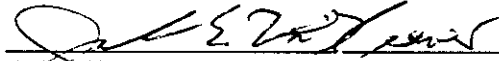
interrogatory PSA/UPS-1(d), UPS does not have the requested information. In addition, isolating ground parcel shipments during the 1990's would require a special study and would impose an undue burden on UPS, and most likely is not even possible.

Moreover, UPS does not know how many of the parcels sent by UPS's various services during the 1990's could or would have been sent by Parcel Post. As a result, UPS is unable to provide such information, and any comparison with Parcel Post volume alone is not relevant to the issues in this case. Finally, even if UPS could determine the number of ground parcel shipments handled during the 1990's, information on the volume of such shipments is commercially sensitive. However, UPS will provide a comparison of total UPS volume with total Postal Service parcel and express volume for the last five years. UPS will also provide in response to this interrogatory a breakdown of its volume in categories that are not confidential, with a description of each such category.

Interrogatory PSA/UPS-9 requests a comparison of "Parcel Post performance of the standards defining value of service with UPS' performance of those standards," referring to interrogatory PSA/UPS-T6-10. UPS objects to this interrogatory because it is unduly vague and ambiguous. Furthermore, information regarding UPS's

performance "of the standards defining value of service" is not relevant to the issues in this proceeding, and is commercially sensitive.

Respectfully submitted,



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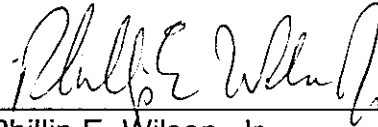
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CERTIFICATE OF SERVICE

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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Attorney for United Parcel Service

Dated: July 17, 2000.
Philadelphia, Pa.

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