

BEFORE THE  
POSTAL RATE COMMISSION

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OFFICE OF THE SECRETARY

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: POSTAL RATE AND FEE CHANGES, 2000 :  
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DOCKET NO. R2000-1

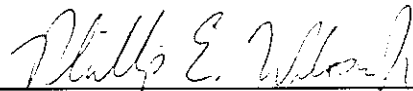
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INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS FROM UNITED PARCEL SERVICE DIRECTED  
TO THE UNITED STATES POSTAL SERVICE  
(UPS/USPS-44 through UPS/USPS-51)  
(July 26, 2000)

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Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to the United States Postal Service: UPS/USPS-44 through UPS/USPS-51.

Respectfully submitted,



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Of Counsel.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
UNITED PARCEL SERVICE DIRECTED TO UNITED STATES POSTAL SERVICE

UPS/USPS-44. Confirm that in FY1998, Postal Service Handbook F-75, entitled "Data Collection User's Guide for Revenue, Volume, and Performance Measurement Systems" and filed as Library Reference USPS-LR-I-37, instructed data collectors as follows: "If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece." See USPS-LR-I-37, pages 3-83, 3-95, 3-149, and 3-156, attached hereto.

UPS/USPS-45. Confirm that, in the PERMIT System for FY1998, Standard Mail (A) mailpieces that paid Standard Mail (B) rates were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1998.

UPS/USPS-46. Confirm that, in the PERMIT System for FY1999, Standard Mail (A) mailpieces that paid Standard Mail (B) rates were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1999.

UPS/USPS-47. (a) In FY1999, did DRPW data collectors record Standard Mail (A) mailpieces that paid Standard Mail (B) rates as Standard Mail (A) pieces or as Standard Mail (B) pieces?

(b) Provide copies of any directives, training materials, instructions, manuals, handbooks, or other type of documents indicating how DRPW data collectors

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were instructed to record in FY1999 (or in any part thereof) Standard Mail (A) mailpieces that paid Standard (B) rates.

UPS/USPS-48. In FY1999, did DRPW data collectors record pieces weighing less than one pound that would qualify for Standard Mail (A) which paid Standard Mail (B) rates as Standard Mail (A) pieces or as Standard Mail (B) pieces?

UPS/USPS-49. Confirm that, in the PERMIT System for FY1998, pieces weighing less than one pound that would have qualified for Standard Mail (A) were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1998.

UPS/USPS-50. Confirm that, in the PERMIT System for FY1999, pieces weighing less than one pound that would qualify for Standard Mail (A) were counted as Standard (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1999.

UPS/USPS-51. Provide a copy of those workpapers underlying the FY1999 Cost and Revenue Analysis (using the Postal Rate Commission's methodology) similar to Postal Service witness Meehan's "Workpaper Vol. B" base year cost segment spreadsheets filed in support of the Postal Service's BY1998 Cost and Revenue Analysis.

- **Standard Mail (A) Single Piece paid at Standard Mail (B) rates:** If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose *Other Revenue* and enter the revenue as *Paid Correctly*. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned and a postage due clerk is marking it up at the Standard Mail (B) rate.

**1 From your *Main Options Menu*, select Option <3> Standard Mail (A).**

CODES displays one of two *Main Options Menu* screens (Figure 3-21 or Figure 3-22). Select Option <3> Standard Mail (A).

**2 Select the rate category that corresponds to your mailpiece(s) by performing the substeps that follow the screen shown below.**

CODES will display the *Standard Mail (A) Options Menu* (Figure 3-37). For examples and a consolidated procedure that includes both rate category selection and final verification guidelines, refer to RM 3-06.

Standard Incoming Test		Sample Facility Number Four	
<b>Mailpiece</b> Std. Mail A	<b>Data Entry</b> 1. Standard A Single Piece 2. Standard A Regular 3. Standard A Enhanced Car-Rt 4. Standard A Nonprofit Regular 5. Standard A Nonprofit Enhanced Car-Rt 6. Keys & Other ID Devices.		
<b>Special Service(s)</b>			
<b>Revenue</b> Mailpiece \$ Total	<b>Messages</b>		
<b>Category</b>			
<H> Help		↑ Back Up	<E> Erase Record 3

Figure 3-37. Standard Mail (A) Options Menu

- a Check to see if the mailpiece is Standard Mail (A) Regular, Standard Mail ECR, Standard Mail (A) Nonprofit, Standard Mail (A) Nonprofit ECR, or Standard Mail (A) Single Piece.
  - I. If the mailpiece is endorsed *Bulk Rate* or *Blk. Rt.*, it is either Standard Mail (A) Regular or Standard Mail (A) Enhanced Carrier Route (ECR). If either is the case, go to Step 2b.

- iv. If the mailpiece bears an automation rate barcode, record the mailpiece as *Basic Automation, No destination discount*.
- v. If the mailpiece has not yet been classified, record the mailpiece as *Basic Automation, No destination discount*.

**12 For all Standard Mail (A) Regular, ECR, Nonprofit Regular, and Nonprofit ECR, go to Step 2 of Section 3.10.5.**

**3.10.4 Standard Mail (B)**

As you enter data into the CODES software, a record of your entries for your current mailpiece will be displayed in the upper left field of the CODES Laptop screen.

**Standard Mail (B):** This mailpiece is not marked First-Class, Priority, or Periodicals. With the exception of Library Mail and Special Mail, Standard Mail (B) weighs 16 ounces or more. It has the following dimensions and weight limitations: each piece may not exceed 70 Lbs., except matter at bound printed matter rates (which may not exceed 10 pounds). The combined length and girth of a piece may not exceed 108 inches.

Note the following exceptions:

- **Bound Printed Matter (BPM) Permit Imprint:** BPM Permit Imprint mailpieces are not countable in the RPW test.
- **Unendorsed mail over 16 ounces:** With one exception, always record unendorsed mail weighing 16 ounces or greater as Standard Mail (B) zone rated parcel mail. The one exception to this rule is when the mailpiece bears metered or stamped postage equal to or greater than what the mailpiece's Priority rate would be if you were to base this rate upon the mailpiece's zone and weight. If the unendorsed mailpiece weighs more than 16 ounces and the metered or stamped postage is equal to or greater than the Priority rate consistent with the mailpiece's zone and weight, record the mailpiece as Priority Mail. For more information on unendorsed mail, see Section 3.15, Part 5, *Unendorsed Mail*.
- **Standard Mail (A) paid at Standard Mail (B) rates:** If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose *Other Revenue* and enter the revenue as *Paid Correctly*. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned as postage due.

Consolidated Originating		ROSEDALE BRANCH	
Mailpiece Priority Regular ZIP = 223 zone = 1	Data Entry  Enter weight of piece(s): Lbs <input type="text"/> Oz		
Special Service(s)			
Revenue Mailpiece SS Total	Messages		
Category			
<H> Help		↑ Back Up	
		<E> Erase Record 3	

Figure 3-121. Priority Manual Weight of Mailpieces

### 6 Record the COD or the insurance fee. Then go to Section 3.12.8.

CODES will display the *COD Fee* screen or the *Insurance Fee* screen (see Figure 3-116 or Figure 3-117). Enter the amount of the COD or insurance revenue shown on the mailpiece and press <Enter>.

### 3.12.3

#### Standard Mail (A), COD, and Insured

As you input data into the CODES software, a record of your entries for your current mailpiece will be displayed in the upper left field of the CODES Laptop screen.

**Standard Mail (A):** This mail is neither mailed or required to be mailed as First-Class, nor is it entered as Periodicals. Each Standard Mail (A) mailpiece must weigh less than 16 ounces.

Observe the following guidelines and exceptions to Standard Mail (A) originating mail:

- Standard Mail (A) Single Piece paid at Standard Mail (B) rates:** If you find a Standard Mail (A) single-rated mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose *Other Revenue* and enter the revenue as *Paid Correctly*. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned and a postage due clerk is marking it up at the Standard Mail (B) rate.

and weight. If the unendorsed mailpiece weighs more than 16 ounces and the metered or stamped postage is equal to or greater than the Priority rate consistent with the mailpiece's zone and weight, record the mailpiece as Priority Mail. For more information on unendorsed mail, see Section 3.15, Part 5, *Unendorsed Mail*.

- **Standard Mail (A) paid at Standard Mail (B) rates:** If you find a Standard Mail (A) single-rated mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose *Other Revenue* and enter the revenue as *Paid Correctly*. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned as postage due.

**1 From your *Main Options Menu for Originating Mail*, select COD or Insured.**

Once you have selected a subsampling option, CODES displays the *Main Options Menu for Originating Mail* (Figure 3-107 and Figure 3-108). Select either COD or insured, depending on your mailpiece.

**2 Select Option <4> Standard Mail (B).**

CODES displays the *Main Options Menu for COD or Insured Mail* (Figure 3-109 or Figure 3-110). Select Option <4> from either menu.

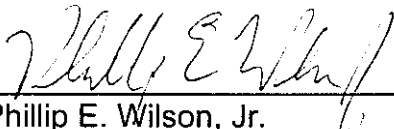
**3 Select one of the options given in the *Standard Mail (B) Main Options Menu*.**

CODES displays the *Standard Mail (B) Main Options Menu* (Figure 3-131). Type the number of the appropriate option and press <Enter>: Parcel Post Zone Rated; Special Standard Mail (B) Single Piece and Bulk Presort; Bound Printed Matter Single Piece, Bulk, and Bulk Carrier Rt.; and Library Mail.

For definitions, see RM 3-07.

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

Dated: July 26, 2000.  
Philadelphia, Pa.

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