

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MUSGRAVE
(UPS/USPS-T9-1 through 14)
(October 10, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to United States Postal Service witness Musgrave (UPS/USPS-T9-1 through 14).

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MUSGRAVE

UPS/USPS-T9-1. Provide for BY2000 (i) the volume of Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-2. Provide for BY2000 (i) the volume of Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If the information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-3. Provide for Express Mail the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-4. Provide for Express Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-5. Provide for Express Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-6. Provide for Express Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-7. Refer to page 40 of your testimony, USPS-T-9, at 40, where you discuss "Christmas Express Mail."

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(a) Provide for BY2000 (i) the volume of Christmas Express Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for BY2000 (i) the volume of Christmas Express Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If the information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide for Christmas Express Mail the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(d) Provide for Christmas Express Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for Christmas Express Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for Christmas Express Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-8. Provide for BY2000 (i) the volume of Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by

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businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-9. Provide for by BY2000 (i) the volume of Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-10. Provide for Priority Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-11. Provide for Priority Mail the volume that was sent by businesses to residential customers in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-12. Provide for Priority Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-13. Provide for Priority Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T9-14. Refer to pages 19-20 of your testimony, USPS-T-9, at 19-20, where you refer to "Christmas Priority Mail."

(a) Provide for BY2000 (i) the volume of Christmas Priority Mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses.

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If this information is not available, provide the Postal Service's best estimates of such volumes.

(b) Provide for by BY2000 (i) the volume of Christmas Priority Mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimates of such volumes.

(c) Provide for Christmas Priority Mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.


(d) Provide for Christmas Priority Mail the volume that was sent by businesses to residential customers in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(e) Provide for Christmas Priority Mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

(f) Provide for Christmas Priority Mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

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.
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Dated: October 10, 2001
Philadelphia, PA

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