

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 TOLLEY
(UPS/USPS-T7-1 through 41)
(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 Tolley (UPS/USPS-T7-1 through 41).

Respectfully submitted,



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UPS/USPS-T7-1. Provide for BY2000 (i) the volume of First Class letter 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-T7-2. Provide for BY2000 (i) the volume of First Class letter 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-T7-3. Provide for First Class letter 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-T7-4. Provide for First Class letter 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-T7-5. Provide for First Class letter 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-T7-6. Provide for First Class letter 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-T7-7. Provide for BY2000 (i) the volume of single piece First Class letter mail that was sent by residential customers, and, separately, (ii) the volume that

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

UPS/USPS-T7-8. Provide for by BY2000 (i) the volume of single piece First class letter 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-T7-9. Provide for single piece First Class letter 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-T7-10. Provide for single piece First Class letter 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-T7-11. Provide for single piece First Class letter 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-T7-12. Provide for single piece First Class letter 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-T7-13. Provide for BY2000 (i) the volume of First Class parcels 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.

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UPS/USPS-T7-14. Provide for BY2000 (i) the volume of First Class parcels 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-T7-15. Provide for First Class parcels 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-T7-16. Provide for First Class parcels 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-T7-17. Provide for First Class parcels 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-T7-18. Provide for First Class parcels 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-T7-19. Provide for BY2000 (i) the volume of Parcel Post 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-T7-20. Provide for BY2000 (i) the volume of Parcel Post that was sent to residential customers, and, separately, (ii) the volume that was sent to

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

UPS/USPS-T7-21. Provide for Parcel Post 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-T7-22. Provide for Parcel Post 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-T7-23. Provide for Parcel Post 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-T7-24. Provide for Parcel Post 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-T7-25. Refer to page 135 of your testimony, USPS-T-7, where you state that "much of the volume of [Parcel Post] consists of shipments of merchandise from businesses to households." Provide for BY2000 the volume of Parcel Post that consisted of shipments of merchandise from businesses to households. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T7-26. Provide for BY2000 (i) the volume of Nondestination Entry Parcel Post (inter-BMC and intra-BMC) that was sent by residential customers, and,

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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-T7-27. Provide for BY2000 (i) the volume of Nondestination Entry Parcel Post (inter-BMC and intra-BMC) 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-T7-28. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) 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-T7-29. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) 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-T7-30. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) 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-T7-31. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) 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.

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UPS/USPS-T7-32. Provide for BY2000 (i) the volume of Destination Entry Parcel Post (DBMC, DSCF, DDU) 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-T7-33. Provide for BY2000 (i) the volume of Destination Entry Parcel Post (DBMC, DSCF, DDU) 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-T7-34. Provide for Destination Entry Parcel Post (DBMC, DSCF, DDU) 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-T7-35. Provide for Destination Entry Parcel Post (DBMC, DSCF, DDU) 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-T7-36. Provide for BY2000 (i) the volume of Bound Printed Matter 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-T7-37. Provide for BY2000 (i) the volume of Bound Printed Matter that was sent to residential customers, and, separately, (ii) the volume that was sent to

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

UPS/USPS-T7-38. Provide for Bound Printed Matter 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.

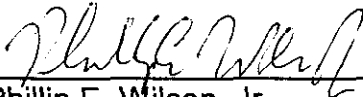
UPS/USPS-T7-39. Provide for Bound Printed Matter the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

UPS/USPS-T7-40. Provide for Bound Printed Matter 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-T7-41. Provide for Bound Printed Matter 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.
Attorney for United Parcel Service

Dated: October 10, 2001
Philadelphia, PA

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