POSTAL RATE AND FEE CHANGES, 2001 :

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DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
WITNESS MOELLER
(UPS/USPS-T28-5 through 20)
(November 7, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby

files and serves the following interrogatories directed to United States Postal Service

Witness Moeller: UPS/USPS-T28-5 through 20.

Respectfully submitted,

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INTERROGATORIES OF UNITED PARCEL SERVICE TO
THE UNITED STATES POSTAL SERVICE WITNESS MOELLER

UPS/USPS-T28-5. Using Origin Destination Information System ("ODIS") data,
provide separately the portion of FY2000 Priority Mail volume sent within:

    (a)   a one-day service area that arrived:

        (i)   in one day;

        (ii)   in more than one day:

    (b)   a two-day service area that arrived:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

    (c)   a three-day service area that arrived:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-6. Using Origin Destination Information System ("ODIS") data,
provide separately the portion of Priority Mail volume for any available FY2001 quarters
sent within:

    (a)   a one-day service area that arrived:

        (i)   in one day;

        (ii)   in more than one day.

    (b)   a two-day service area that arrived:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

(c)   a three-day service area that arrived:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-7. Using Priority End-To-End ("PETE") data, provide separately the portion of FY2000 Priority Mail volume sent within:

(a)   a one-day service area that was actually delivered:

        (i)   in one day;

        (ii)   in more than one day;

(b)   a two-day service area that was actually delivered:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

(c)   a three-day service area that was actually delivered:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-8. Using Priority End-To-End ("PETE") data, provide separately the portion of Priority Mail volume for any available FY2001 quarters sent within:

(a)   a one-day service area that was actually delivered;

        (i)   in one day;

      (ii)   in more than one day;

(b)   a two-day service area that was actually delivered:

      (i)   in two days;

      (ii)   in less than two days;

      (iii)   in more than three days; and

(c)   a three-day service area that was actually delivered:

      (i)   in three days;

      (ii)   in less than three days;

      (iii)   in more than three days.

UPS/USPS-T28-9. Using External First-Class ("EXFC") system data, provide the

portion of FY2000 First-Class Mail volume sent within:

(a)   a one-day service area that was actually delivered:

      (i)   in one day;

      (ii)   in more than one day;

(b)   a two-day service area that was actually delivered:

      (i)   in two days;

      (ii)   in less than two days;

      (iii)   in more than two days; and

(c)   a three-day service area that was actually delivered:

      (i)   in three days;

      (ii)   in less than three days;

      (iii)   in more than three days.

INTERROGATORIES OF UNITED PARCEL SERVICE TO
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UPS/USPS-T28-10. Using External First-Class ("EXFC") system data, provide

the portion of First-Class Mail volume for any available FY2001 quarters sent within:

    (a)   a one-day service area that was actually delivered:

        (i)   in one day;

        (ii)   in more than one day;

    (b)   a two-day service area that was actually delivered:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

    (c)   a three-day service area that was actually delivered:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-11. Using Origin Destination Information System ("ODIS") data,

provide the portion of FY2000 First-Class Mail volume sent within:

    (a)   a one-day service area that was actually delivered:

        (i)   in one day;

        (ii)   in more than one day;

    (b)   a two-day service area that was actually delivered:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

    (c)   a three-day service area that was actually delivered:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-12. Using Origin Destination Information System ("ODIS") data, provide the portion of First-Class Mail volume for any available FY2001 quarters sent within:

    (a)   a one-day service area that was actually delivered:

        (i)   in one day;

        (ii)   in more than one day;

    (b)   a two-day service area that was actually delivered:

        (i)   in two days;

        (ii)   in less than two days;

        (iii)   in more than two days; and

    (c)   a three-day service area that was actually delivered:

        (i)   in three days;

        (ii)   in less than three days;

        (iii)   in more than three days.

UPS/USPS-T28-13. Provide recent national performance data from the External First-Class ("EXFC") measurement system for every category of mail available (e.g., flats, letters, small parcels and rolls, handwritten, type written, bar-coded, etc.).

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UPS/USPS-T28-14. Provide recent national performance data from the Priority End-To-End ("PETE") measurement system for every category of mail available (e.g., flats, letters, Small Parcels and Rolls, handwritten, typewritten, bar-coded, etc.)

UPS/USPS-T28-15. Comparing External First-Class ("EXFC") data and Priority End-To-End ("PETE") data, provide the extent to which Priority Mail was delivered as fast or faster than First Class Mail for the 85 performance clusters included in the PETE system during each quarter of FY1999 and FY2000, and each available quarter of FY 2001.

UPS/USPS-T28-16. Provide separately the average length of haul for First-Class Mail within the following service areas:

(a)   one day;

(b)   two days;

(c)   three days.

UPS/USPS-T28-17. Provide separately the average length of haul for Priority Mail within the following service areas:

(a)   one day;

(b)   two days;

(c)   three days.

UPS/USPS-T28-18. Describe and quantify all improvements in Priority Mail service performance since FY1999.
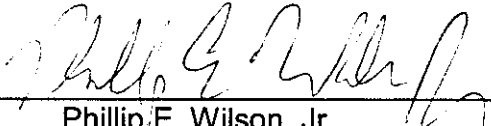
UPS/USPS-T28-19. Describe and quantify all improvements in First-Class Mail service performance since FY1999.

INTERROGATORIES OF UNITED PARCEL SERVICE TO
THE UNITED STATES POSTAL SERVICE WITNESS MOELLER

UPS/USPS-T28-20. For each quarter in BY2000, and for any available quarter in

FY2001, provide copies of the Service Performance Quarterly Reports for First-Class

Mail based on the External First-Class ("EXFC") service performance measurement

system.

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

_____
Phillip E. Wilson, Jr.

Dated: November 7, 2001
Philadelphia, PA

90451