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BEFORE THE POSTAL RATE COMMISSION

Aug 4 8 57 AH '97

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS MAYES (UPS/USPS-T37-14 through 23)

(August 4, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Mayes (UPS/USPS-T37-14 through 23).

Respectfully submitted,

John E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

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Of Counsel.

UNITED PARCEL SERVICE FOURTH SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS MAYES

UPS/USPS-T37-14. Referring to pages 2, 3, and 7-10 of your testimony, please provide copies of all publications, instructions, manuals, memos, correspondence, operating procedures and other documentation pertaining to Postal Service DBMC, OBMC entry, BMC presort, DSCF dropship, and DDU dropship rates and services.

UPS/USPS-T37-15. Please provide a complete description of the following parcel shipper requirements to qualify for the DBMC discount:

- (a) Parcel volumes;
- (b) Parcel types (e.g., machinable, non-machinable, etc.);
- (c) Containerization and type:
- (d) Sortation;
- (e) Qualification and authorization;
- (f) Transportation equipment;
- (g) USPS entry facility;
- (h) Scheduling/notification of shipment delivery at entry facility;
- (i) Payment for mailing.

UPS/USPS-T37-16. Referring to interrogatory UPS/USPS-T37-16, please provide a complete description of (a) through (i) for each of the following for a shipper to qualify for each of the following parcel post shipment discounts:

(i) OBMC entry;

- (ii) BMC presort;
- (iii) DSCF dropship;
- (iv) DDU dropship.

UPS/USPS-T37-17. Referring to page 2, line 23, page 8, lines 6 and 21, and page 10, line 9, of your testimony, please provide a detailed definition of "properly prepared" as used at each of these references.

UPS/USPS-T37-18. Referring to page 10, lines 13 to 23, of your testimony, what will be the "properly prepared" requirements for DDU dropship mailings?

UPS/USPS-T37-19. Referring to page 8, lines 22 and 23, of your testimony, please provide copies of all current publications and documentation defining machinable and non-machinable parcels.

UPS/USPS-T37-20. Referring to pages 7-10 of your testimony,

- (a) Please provide a detailed description of the rules for assigning and determining the originating 5-digit zip code for each of the following:
 - (i) DBMC;
 - (ii) OBMC entry;
 - (iii) BMC presort;
 - (iv) DSCF dropship;
 - (v) DDU dropship.

(b) Please provide an example of each of these rules using actual postal facilities and zip codes for (a) (i)-(v).

UPS/USPS-T37-21. Referring to page 18, lines 4-5, of your testimony, please provide a detailed explanation and copies of all analyses and documentation supporting the determination of the 108 inch maximum combined length and girth for parcel post pieces.

UPS/USPS-T37-22. Referring to page 18, line 13, of your testimony, please provide a detailed explanation and copies of all analyses and documentation supporting the determination of the 130 inch maximum combined length and girth for parcel post pieces.

UPS/USPS-T37-23. Referring to page 1, lines 14 and 15, of your testimony, please provide a legible copy of the most recent map of the National Bulk Mail System showing the designated geographical boundaries of all BMCs and ASFs. Note all changes to make the map current.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Dated: August 4, 1997 Philadelphia, PA