

**BEFORE THE
POSTAL RATE COMMISSION**

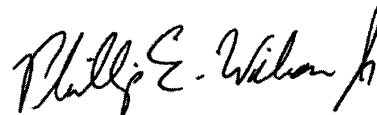
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
(UPS/USPS-16 through 21)
(November 15, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatories directed to the United States Postal Service: UPS/USPS-16 through 21.

Respectfully submitted,



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INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSAL SERVICE

UPS/USPS-16. Refer to the Postal Service's response to Interrogatory UPS/USPS-T21-4, redirected from Witness Kay, regarding the Postal Service's product promotion activities for Priority Mail, Express Mail, and Parcel Post at mail and parcel events and conferences. In that interrogatory response, the Postal Service states that sales personnel follow up on leads generated by customers who visit the exhibits. Identify the number of sales leads generated for each Postal Service product promoted at these events as a portion of the total sales leads generated.

UPS/USPS-17.

(a) Confirm that the only services of the United States Postal Service that are included in the American Society for Quality's American Customer Satisfaction Index ("ACSI"), Parcel Delivery and Express Mail Industry Segment, are Express Mail, Priority Mail, and Parcel Post.

(b) Confirm that of the three entities included in the Parcel Delivery and Express Mail Industry Segment of the ACSI, only the United States Postal Service has shown a positive improvement in customer satisfaction since the ACSI began measuring this segment. If not confirmed, explain in detail.

(c) Provide the results of the ACSI surveys separately for each of the Postal Service products included in the ACSI survey.

INTERROGATORIES OF UNITED PARCEL SERVICE
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UPS/USPS-18. Refer to the Postal Service's response to interrogatory DFC/USPS-5. For each accounting period for each of the past three years, and for each category or type of First-Class Mail (excluding Priority Mail) for which the Postal Service collects data, provide nationwide data from Priority End-To-End ("PETE"), Origin Destination Information System ("ODIS"), and any other applicable systems showing:

- (a) The percentage of the time that mail is delivered within the number of days specified by the applicable service standard; and
- (b) The average number of days to delivery.

UPS/USPS-19. Refer to the Postal Service's response to interrogatory DFC/USPS-6. For each accounting period for each of the past three years, provide nationwide data from Priority End-To-End ("PETE"), ODIS, and any other applicable systems showing for Priority Mail:

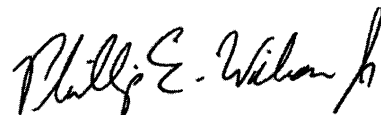
- (a) The percentage of the time that mail is delivered within the number of days specified by the applicable service standard; and
- (b) The average number of days to delivery.

UPS/USPS-20. What steps did the Postal Service take in FY 2001 to improve Priority Mail performance?

UPS/USPS-21. What steps does the Postal Service plan to take to improve Priority Mail service performance beginning at the end of FY 2001 through the test year?

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.

A handwritten signature in black ink, reading "Phillip E. Wilson Jr". The signature is written in a cursive, flowing style.

Phillip E. Wilson, Jr.

Dated: November 15, 2001
Philadelphia, PA

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