

**BEFORE THE
POSTAL RATE COMMISSION**

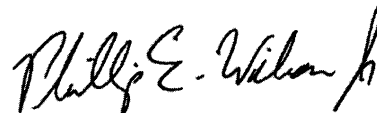
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS MEEHAN
(UPS/USPS-T11-9 through 14)
(November 21, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatory directed to United States Postal Service witness Meehan: UPS/USPS-T11-9 through 14.

Respectfully submitted,



John E. McKeever
Phillip E. Wilson, Jr.
Laura A. Biancke
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3300

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

(215) 656-3301 (FAX)

and

1200 Nineteenth Street, NW
Washington, DC 20036-2430

(202) 861-3900

INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MEEHAN

UPS/USPS-T11-9. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales.

(a) For which products and services has the Postal Service developed national sales policies and/or programs? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to develop the national sales policy and/or program for that product or service.

(b) For which products and services has the Postal Service developed and implemented sales strategies and plans? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to develop and implement that product or service's sales strategies and plans.

(c) For which products and services has the Vice President of Sales directed lead generation activities and initiatives? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used for lead generation activities and initiatives for that product or service.

(d) For which products and services has the Vice President of Sales managed, developed, implemented, and/or improved direct selling programs? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, implement, and/or improve direct selling programs for that product or service.

(e) For which products and services has the Vice President of Sales managed, developed, and/or implemented systems and solutions related to increasing

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high impact sales? For each of the products and services identified, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, and/or implement systems and solutions related to increasing high impact sales for that product or service.

UPS/USPS-T11-10. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Postal Service developed national sales policies and/or programs for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to develop national sales policies and/or programs for First Class Single Piece mail.

UPS/USPS-T11-11. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Postal Service developed and implemented sales strategies and plans for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to develop and implement sales strategies and plans for First Class Single Piece mail.

UPS/USPS-T11-12. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales directed lead generation activities and initiatives for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used for lead generation activities and initiatives for First Class Single Piece mail.

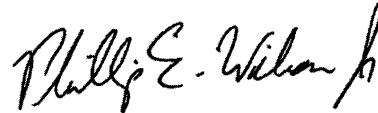
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UPS/USPS-T11-13. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales managed, developed, implemented, and/or improved direct selling programs for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, implement, and/or improve direct selling programs for First Class Single Piece mail.

UPS/USPS-T11-14. Refer to your response to interrogatory UPS/USPS-T11-2(b), which discusses the position description for the Postal Service's Vice President of Sales. Has the Vice President of Sales managed, developed, and/or implemented systems and solutions related to increasing high impact sales for First Class Single Piece mail? If so, state the portion of the annualized Sales Function cost for the Base Year used to manage, develop, and/or implement systems and solutions related to increasing high impact sales for First Class Single Piece mail.

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.

A handwritten signature in black ink that reads "Phillip E. Wilson, Jr." with a stylized flourish at the end.

Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: November 21, 2001
Philadelphia, PA

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