

**BEFORE THE
POSTAL RATE COMMISSION**

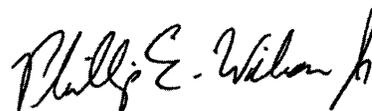
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO THE UNITED STATES POSTAL SERVICE
WITNESS MOELLER
(UPS/USPS-T28-33 through 42)
(November 29, 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-T28-33 through 42.

Respectfully submitted,



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UPS/USPS-T28-33. Using Delivery Confirmation data, provide separately for FY1998, FY1999, FY2000, and FY2001 the portion of Priority Mail volume sent within:

- (a) the one-day service area for Priority Mail that actually arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) the two-day service area for Priority Mail that actually arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) the three-day service area for Priority Mail that actually arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

UPS/USPS-T28-34. Refer to the Postal Service's response to interrogatory DFC/USPS-6(a).

(a) Provide a breakdown of the PETE data, % On Time Overnight Commitment and % On Time 2-Day Commitment, separately for FY1998, FY1999, FY2000, and FY2001, for:

- (i) Priority Mail flats; and
- (ii) Priority Mail Parcels.

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(b) Provide a breakdown of the ODIS data, % On Time Overnight Commitment and % On Time 2-Day Commitment, separately for FY1998, FY1999, FY2000, and FY2001, for:

- (i) Priority Mail flats; and
- (ii) Priority Mail Parcels.

UPS/USPS-T28-35. Using PETE data, provide separately for FY1998, FY1999, FY2000, and FY2001 the number of Priority Mail pieces:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

UPS/USPS-T28-36. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you state that “a significant goal for the Postal Service when entering into the FedEx transportation contract is to provide more consistent and reliable service for Express Mail and Priority Mail”

- (a) Define “consistent” as you use the term in that response.
- (b) Define “reliable” as you use the term in that response.

UPS/USPS-T28-37. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you state that “a significant goal for the Postal Service when entering into the FedEx transportation contract is to provide more consistent and reliable service for Express Mail and Priority Mail”

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(a) In what ways does the Postal Service expect the FedEx transportation contract to help the Postal Service meet its goal of making Express Mail and Priority Mail service more consistent?

(b) In what ways does the Postal Service expect the FedEx transportation contract to help the Postal Service meet its goal of making Express Mail and Priority Mail service more reliable?

(c) How much closer to achieving the goal of more consistent and reliable service for Express Mail and Priority Mail will the Postal Service be in the Test Year than it is today?

UPS/USPS-T28-38. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you indicate that “customer perceptions” of Express Mail service need to change.

(a) Describe in detail your understanding of how Express Mail service is perceived by customers and the basis for that understanding.

(b) What is your assessment of the accuracy of “customer perceptions” of Express Mail service, and what is the basis for your assessment?

(c) Describe all efforts the Postal Service has taken and will be taking to change these customer perceptions during the period from the base year to the test year.

(d) Identify the extent to which the measures identified in your response to subpart (c) of this interrogatory factored into the recommended cost coverage for Express Mail in the test year.

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UPS/USPS-T28-39. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you indicate that “customer perceptions” of Priority Mail service need to change.

(a) Describe in detail your understanding of how Priority Mail service is perceived by customers and the basis for that understanding.

(b) What is your assessment of the accuracy of “customer perceptions” of Priority Mail service, and what is the basis for your assessment?

(c) Describe all efforts the Postal Service has taken and will be taking to change these customer perceptions during the period from the base year to the test year.

(d) Identify the extent to which the measures identified in your response to subpart (c) of this interrogatory factored into the recommended cost coverage for Priority Mail in the test year.

UPS/USPS-T28-40. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you state that changing customer perceptions of Express Mail service “may take much longer than the service changes.” Provide your best estimate of when customer perceptions of Express Mail service will fully respond to the service improvements to accurately reflect the improved quality of the service.

UPS/USPS-T28-41. Refer to your response to interrogatories UPS/USPS-T28-4(a) and 4(b), in which you state that changing customer perceptions of Priority Mail service “may take much longer than the service changes.” Provide your best estimate

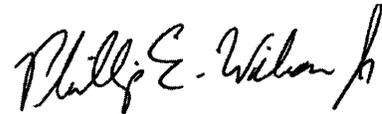
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of when customer perceptions of Priority Mail service will fully respond to the service improvements to accurately reflect the improved quality of the service.

UPS/USPS-T28-42. Describe all factors which make Priority Mail more difficult to process and handle than First Class Mail, including Postal Service operations, content restrictions, available automation, machinability, weight and dimensional differences, and average cube size.

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 that reads "Phillip E. Wilson, Jr." with a stylized flourish at the end.

Phillip E. Wilson, Jr.

Dated: November 29, 2001
Philadelphia, PA

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