

**BEFORE THE
POSTAL RATE COMMISSION**

POSTAL RATE AND FEE CHANGES, 2001

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DOCKET NO. R2001-1

**MOTION OF UNITED PARCEL SERVICE TO COMPEL
RESPONSES TO INTERROGATORIES UPS/USPS-T28-5, 14, 15 AND 20
(December 7, 2001)**

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby moves that the Presiding Officer order the Postal Service to answer interrogatories UPS/USPS-T28-5,14,15 and 20, filed on November 7, 2001, and to produce the materials requested therein. A copy of each of the interrogatories is attached hereto as Exhibit A.

Answers to these interrogatories were due November 21, 2001. Since no answers were filed as of November 27, 2001 -- 6 days after the deadline -- counsel for UPS contacted the Postal Service on that date in an attempt to obtain responses without the Commission's involvement. However, to date, the Postal Service has neither responded to the interrogatories nor filed an objection thereto. Therefore, the Postal Service has waived its right to object and should be required to answer.

WHEREFORE, United Parcel Service respectfully requests that the Presiding Officer order the United States Postal Service to answer interrogatories UPS/USPS-T28-5,14,15 and 20, and to produce the materials requested therein.

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-T28-14. 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.)

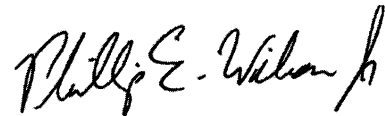
EXHIBIT "A"

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-T28-20. 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 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.



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

Dated: December 7, 2001
Philadelphia, PA

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