

BEFORE THE
POSTAL RATE COMMISSION

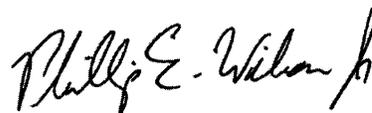
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
(UPS/USPS-T39- 66 through 67)
(December 7, 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 Kingsley: UPS/USPS-T39-66 through 67.

Respectfully submitted,



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

UPS/USPS-T39-66. Refer to your response to interrogatory UPS/USPS-T33-6 (redirected from Witness Kiefer).

(a) How many pieces of parcel-shaped volume does a carrier typically deliver in a day? Provide a breakdown by type of carrier route.

(b) How many pieces of parcel-shaped volume can a carrier typically deliver in a day? Provide a breakdown by type of carrier route.

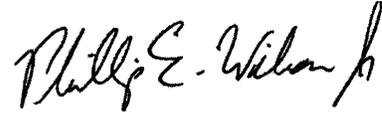
(c) How often is a carrier unable to deliver all of the parcel-shaped volume for his or her route in a particular day? Provide a breakdown by type of carrier route.

(d) Is the decision that a carrier will not deliver all parcels at the Destination Delivery Unit ("DDU") for his or her route in a given day made prior to the carrier leaving the DDU? If not, when is the decision made, and by whom?

UPS/USPS-T39-67. Refer to your response to interrogatory UPS/USPS-T33-6 (redirected from Witness Kiefer). Describe any "local procedures" regarding delivery of parcel-shaped volume in excess of what a carrier can deliver on a given day regarding delivery of such volume other than deferring its delivery to the next delivery day.

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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