

**BEFORE THE
POSTAL RATE COMMISSION**

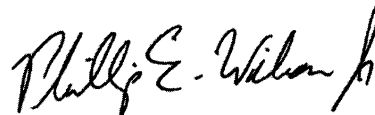
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS SCHERER
(UPS/USPS-T30-9 through 11)
(December 10, 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 Scherer: UPS/USPS-T30-9 through 11.

Respectfully submitted,



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

and
1200 Nineteenth Street, NW
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INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS SCHERER

UPS/USPS-T30-9. Refer to Attachment H to your testimony, USPS-T-30, titled "The Colography Group, Inc. - Domestic Quarterly Market Growth and Competitor Share Report - Total Second-Day and Three-Day Air Letters and Packages."

(a) Is the entire report the Postal Service received from The Colography Group, Inc. contained in this Attachment? If not, provide the entire report.

(b) Provide all reports on the market for second-day and three-day air letters and packages received by the Postal Service from The Colography Group, Inc., for the period 1996 through the present.

(c) Provide all reports on the market for second-day and three-day air letters and packages held by the Postal Service, whether produced by The Colography Group, Inc., or any other entity, including the Postal Service, for the period 1996 through the present.

(d) Identify all Postal Service products or services other than Priority Mail which you consider to be included in the market which is the subject of this report. Provide the basis for your answer.

UPS/USPS-T30-10. Refer to page 5 of your testimony, USPS-T-30, where you state that the definition of the second-day and third-day air market does not include ground services. How is the second-day and third-day air market defined?

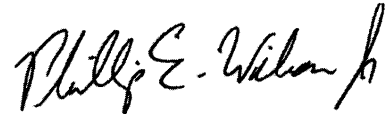
UPS/USPS-T30-11. Refer to page 5 of your testimony, USPS-T-30, where you state that the second-day and third-day air market "definition" does not include ground services. Provide all reports on the market for ground service held by the Postal Service,

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

whether produced by the Colography Group, Inc., or any other entity, including the Postal Service, for the period 1996 through the present.

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 10, 2001
Philadelphia, PA

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