

**BEFORE THE
POSTAL RATE COMMISSION**

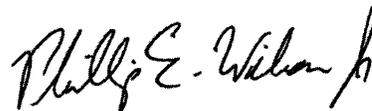
POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO
UNITED STATES POSTAL SERVICE WITNESS COCHRANE
(UPS/USPS-T40-2 through 4)
(December 11, 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 Cochrane: UPS/USPS-T40-2 through 4.

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

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

UPS/USPS-T40-2. Refer to your response to interrogatory UPS/USPS-20 (redirected from the Postal Service) regarding Priority Mail performance in FY2001, in which you mention “lessons learned from the original PMPC sites.”

- (a) What were the “lessons learned from the original PMPC sites”?
- (b) What measures were taken in response to those lessons?
- (c) How and to what extent did the measures taken in response to those lessons translate into improved Priority Mail performance?
- (d) How and to what extent will the measures taken in response to those lessons improve Priority Mail performance in the Test Year?

UPS/USPS-T40-3. Refer to your response to interrogatory UPS/USPS-20 (redirected from the Postal Service) regarding Priority Mail performance in FY2001, in which you discuss “[s]tandardization of mail processing.”

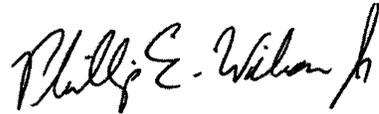
- (a) What measures were taken to introduce “[s]tandardization in mail processing” in FY2001?
- (b) How and to what extent did standardization in mail processing improve Priority Mail performance in FY2001?
- (c) How and to what extent will standardization in mail processing improve Priority Mail performance in the Test Year?

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

UPS/USPS-T40-4. Refer to your response to interrogatory UPS/USPS-21 (redirected from the Postal Service) regarding “possible courses of action” Postal Service management is considering to improve Priority Mail performance from the end of FY2001 through the Test Year. Describe each of these “possible courses of action” and describe the extent to which each is expected to improve Priority Mail performance in FY2002 and FY2003 if implemented.

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 11, 2001
Philadelphia, PA

2028807