

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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COMPLAINT ON POST E.C.S.

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DOCKET NO. C99-1

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SECOND SET OF INTERROGATORIES OF UNITED  
PARCEL SERVICE TO UNITED STATES POSTAL SERVICE  
(UPS/USPS-25 THROUGH UPS/USPS-31)  
(June 8, 1999)

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Pursuant to Section 25 of the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories on the United States Postal Service.

UPS/USPS-25. Have any employees or representatives of the Postal Service (not including La Poste, Canada Post, or IPC, or any of their employees or agents) ever made a sales visit or sales presentation on PostE.C.S. outside of the United States? If so, provide the number of such incidents and (subject to protective conditions) a description of each of them.

UPS/USPS-26. Has the Postal Service licensed any user of PostE.C.S. that is neither (a) a United States company/citizen nor (b) located in the United States? If so, provide the number of all such users, and identify (subject to protective conditions) them and their addresses.

UPS/USPS-27. Describe exactly how a message or document sent to a foreign addressee by a PostE.C.S. user licensed by the Postal Service is transmitted from the user to the addressee.

UPS/USPS-28. What is the location of the server from which a PostE.C.S. message or document is retrieved by the addressee in the case of a PostE.C.S. message or document sent to a foreign addressee by a PostE.C.S. user licensed by the Postal Service?

UPS/USPS-29. How many non-U.S. companies/citizens has the Postal Service licensed to use PostE.C.S.?

UPS/USPS-30. In the Postal Service's view, when is a PostE.C.S. message or document "delivered" to the addressee:

(a) When the message or document is on the server from which the addressee may retrieve the document?

(b) When the addressee's equipment receives notification that the message or document may be retrieved by the addressee?

(c) When the addressee actually attempts to retrieve or retrieves the message or document?

(d) When the addressee opens the document?

(e) Or at some other time? If at some other time, specify when, in the Postal Service's view, the message or document is delivered.

UPS/USPS-31. (a) How many PostE.C.S. messages or documents sent by a PostE.C.S. user licensed by the Postal Service have been sent to a server or servers located outside the United States?

(b) How many PostE.C.S. messages or documents sent by a PostE.C.S. user licensed by the Postal Service have been sent to a server or servers located in the United States?

UPS/USPS-32. (a) When a PostE.C.S. user licensed by the Postal Service sends a message or a document to an addressee outside the United States (in France or Canada, e.g.), does the Postal Service make any payment to a foreign post (La Poste or Canada Post, e.g.)? If so, why?

(b) When a PostE.C.S. user licensed by the Postal Service sends a message or a document from outside the United States to an addressee located in the United States, does the Postal Service make any payment to a foreign post? If so, why?

(c) When a PostE.C.S. user licensed by the Postal Service sends a message or a document to an addressee and the message or document goes to a server that is not located in the United States, does the Postal Service make any payment to a foreign post? If so, why?

UPS/USPS-33. (a) When a PostE.C.S. user licensed by the Postal Service sends a message or a document to an addressee outside the United States (in France or Canada, e.g.), does the Postal Service make any payment to any individual or entity other than a foreign post? If so, why?

(b) When a PostE.C.S. user licensed by the Postal Service sends a message or a document from outside the United States to an addressee located in the United States, does the Postal Service make any payment to any individual or entity other than a foreign post? If so, why?

(c) When a PostE.C.S. user licensed by the Postal Service sends a message or a document to an addressee and the message or document goes to a

server that is not located in the United States, does the Postal Service make any payment to any individual or entity other than a foreign post? If so, why?

Respectfully submitted,



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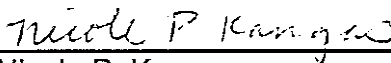
and

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Of Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this date I have caused to be served the foregoing document on all parties to this proceeding by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

  
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Nicole P. Kangas

Dated: June 8, 1999  
Philadelphia, PA