

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

DOCKET NO. C99-1

THIRD SET OF INTERROGATORIES OF UNITED
PARCEL SERVICE TO UNITED STATES POSTAL SERVICE
(UPS/USPS-34 THROUGH UPS/USPS-42)
(June 23, 1999)

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-34. Is the Postal Service's electronic postmark available, or will it be available, other than in conjunction with PostE.C.S.? If so, please identify all products for which it is available.

UPS/USPS-35. Is the electronic postmark a service feature available in connection with PostE.C.S., whether as an add-on or as an integral part of the basic service?

UPS/USPS-36. Is any of the computer equipment used in providing PostE.C.S. used for any other service offered by the Postal Service? If so, please identify all services in addition to PostE.C.S. for which such equipment is used.

UPS/USPS-37. Is any of the computer equipment used in connection with PostE.C.S. used to perform any non-PostE.C.S. function for the Postal Service? If so, please identify all such non-PostE.C.S. functions.

UPS/USPS-38. Are any of the servers used in connection with PostE.C.S. used by the Postal Service for any other purposes? If so, please identify all such uses.

UPS/USPS-39. Are any of the computer programmers used in connection with PostE.C.S. also used for any other purposes of the Postal Service? If so, please identify all such other uses.

UPS/USPS-40. Are any of the phone lines used to render PostE.C.S. used by the Postal Service for any other purposes? If so, please identify all such other uses.

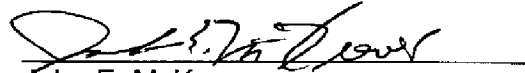
UPS/USPS-41. Please refer to Attachment A hereto, which states in connection with the Postal Service's rendition of PostE.C.S. that a Postal Service representative has stated: "The [Postal Service] brand definitely helps. People know that if they intercept someone's mail, it's a federal crime." Regardless of the accuracy or authenticity of the quote, is it the Postal Service's position that if someone intercepts a PostE.C.S. transmission, that interception is a federal crime? If so, what federal crime is committed (please identify any federal statute that is violated)?

UPS/USPS-42. The General Accounting Office's Report on New Postal Products, GAO/GGD-99-15, indicates that the Postal Service's electronic services are

(or at least were, through the third quarter of Fiscal Year 1998) operating at a loss.

Please identify the source of the revenues used to fund this loss.

Respectfully submitted,



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ZDNN TECH NEWS NOW

Reporter's notebook from Internet World

By *Sean Silverthorne*, ZDNN
 October 9, 1998 4:45 PM PT

NEW YORK -- ZDNN's senior news producer Sean Silverthorne spent the better part of this week prowling the caverns of New York's Javits Center as he attended Fall Internet World '98.



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Some old familiar faces were making their first visit to Internet World. The U.S. Postal Service was here, showing off several products including Post Electronic Courier Service - which allows any kind of file to be sent over the Internet

"at less cost than an overnight service, and with greater reliability than traditional e-mail," says the agency.

Power of the Post Office

I asked one of the booth managers how the Post Office will use its well-known brand against upstarts like PostX. "The brand definitely helps," he said. "People know that if they intercept someone's mail, it's a federal crime."

Other first-timers from the brick-and-mortar world included Barnes & Noble, the technology law firm of Brobeck Phleger, and financial powerhouses Visa and Citibank.

One noticeable trend is that more applications are being targeted at consumers -- a sure sign that people believe this mother lode market

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June 21, 1999 AM

11:07a
Final MS-DOJ testimony begins
10:50a
AOL takes \$1.5B stake in Hughes
10:12a
Qwest's Nacchio is on a roll
08:55a
InfoGear gets \$12M infusion; inks eToy deal
08:52a
News Corp. invests in networking

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ATTACHMENT A

that people believe this mother lode market opportunity is about to pop.

Consumer's delight

Ancestry.com, for example was displaying its online research capabilities. Centraal's RealNames product was picking up some buzz, too. Targeted at the Web novice, RealNames allows users to type in a search using common terms, such as Sony HandyCam, and not have to sift through 123,987 hits.

The phone seems to be becoming more of an Internet force. Motorola unveiled its Voice Markup Language, or VoxML, a technology that will allow users to give Internet commands with voice. And General Magic displayed Portico, a dazzling smart phone network that helps you do everything from scheduling appointments to reading you your e-mail. (Hmmm - do I really want to *hear* those 100 messages piling up in my inbox?)

Where did they go?

But for all the recent talk about Internet appliances, including a huge spread in USA Today this week, there were very few of them to be seen on the show floor. Aplio showed its Internet phone -- a device that lets you place long-distance calls over the Net without a computer. One snag: both parties must have an Aplio phone. The Java-controlled refrigerators will have to wait for another show, apparently.

I was just as surprised by who wasn't at this show as by who was. Very few PC companies were represented. That's interesting because these folks are all trying to figure out how to make their machines more Web-friendly. Seems like Internet World would be a good place to find out. Even Apple, which controls the hot QuickTime technology and sells a product called the iMac (the "i" is for Internet), was absent.

But even several big-time Web brands were MIA, too, including Yahoo! (Nasdaq:YHOO), Amazon.com (Nasdaq:AMZN) and CDNow. How can you have an "Internet World" without those companies?

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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.

Nicole P. Kangas

Nicole P. Kangas

Dated: June 23, 1999
Philadelphia, PA