

DOCKET SECTION

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UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

JUN 28 2 43 PM '99
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Post E.C.S.

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Docket No. C99-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED PARCEL SERVICE
(OCA/UPS-1-12)
June 28, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents to the United Parcel Service.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses to these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards,

discs, tapes and recordings used in data processing together with any written material necessary to understand or use such printouts, microfilms, cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

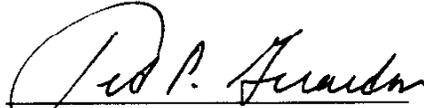
"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

A handwritten signature in cursive script, appearing to read "Ted P. Gerarden". The signature is written in dark ink and is positioned above a horizontal line.

Ted P. Gerarden
Director

Shelley S. Dreifuss
Attorney

OCA/UPS-1. Provide a full description of UPS Document Exchange.

OCA/UPS-2. Provide copies of any form of customer agreement, license agreement, user agreement, software agreement, or other agreement offered by UPS to customers for UPS Document Exchange service.

OCA/UPS-3. What was the date that UPS Document Exchange was first offered to any customer or potential customer?

OCA/UPS-4. Is UPS Document Exchange available to foreign countries? Is it available from foreign countries to the United States? If so, which countries?

OCA/UPS-5. Has UPS entered into any arrangements with third parties in order to provide UPS Document Exchange service? If so, identify such third parties and describe the nature of their activities relating to UPS Document Exchange.

OCA/UPS-6. What is the total number of UPS Document Exchange transactions to date? If this service is international, please specify the proportion of transactions which are to, from, or between foreign countries, and the proportion which are within the United States.

OCA/UPS-7. Is any hard copy produced or printed by UPS or any third party in the course of rendering UPS Document Exchange service? If so, describe the nature and purpose of such hard copy in detail.

OCA/UPS-8. What does UPS charge for UPS Document Exchange transactions? Please be specific, including, but not limited to:

- a. Single document;
- b. Single document to multiple recipients;
- c. Extra charge for password protection;
- d. Tracking or confirmation capability;
- e. Volume discounts;
- f. Cost to use Online Courier 3.0 management features;
- g. Timed delivery.
- h. Any other charges or charges for optional services.

OCA/UPS-9. Have any UPS customers substituted UPS Document Exchange service for the use of:

- a. UPS hardcopy mail services?
- b. Postal Service hardcopy mail services?
- c. Post E.C.S. service?
- d. Please quantify such substitution.

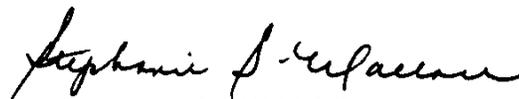
OCA/UPS-10. Does UPS consider the Document Exchange service to be a trial service, an experiment, or a permanent new product?

OCA/UPS-11. Will UPS evaluate the UPS Document Exchange service to determine whether to continue, terminate, or modify the service? If so, provide all documents relating to such evaluation or plan for such evaluation.

OCA/UPS-12. Consider all of the total costs of Document Exchange service (labor, materials, advertising, administrative, programming, development, etc.). Has UPS recovered these costs from revenues for the service? If not, when does UPS expect to recover these costs?

CERTIFICATE OF SERVICE

I hereby certify that on behalf of the Office of the Consumer Advocate, I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
June 28, 1999