

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

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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-13-18)
July 6, 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. Instructions included with OCA interrogatories OCA/UPS-1-12 to the United Parcel Service, dated June 28, 1999, are hereby incorporated by reference.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

Emmett Rand Costich

Ted P. Gerarden
Director

Emmett Rand Costich
Attorney

OCA/UPS-13. Please refer to the linked web addresses

<http://www.tumbleweed.com/>

<http://www.ups.com/bin/shownews.cgi?19990616docexchg>

Please confirm that Tumbleweed Software Corp is the developer of Document Exchange. If you do not confirm, please identify the developer of Document Exchange. Please describe the relationship between UPS and Tumbleweed Software. Please describe the relationship between UPS and any other developer of Document Exchange.

OCA/UPS-14. Does UPS have an exclusive arrangement for the use of the software underlying Document Exchange? If so, describe that arrangement. If not, please explain.

OCA/UPS-15. Please provide the location(s) of the <http://online.courier.com> and <https://online.courier.com> server(s). Are the <http://> and <https://> servers completely separate computers? Please explain.

OCA/UPS-16. Please describe, separately for the <http://> and <https://> servers, what security measures are in place and who enforces the security measures.

OCA/UPS-17. Who owns and controls the <http://online.courier.com> and <https://online.courier.com> server(s)?

OCA/UPS-18. Please describe fully the process by which UPS opens accounts for persons responding to the offer to take a 10-day or 100-transaction trial period of Document Exchange service. Are any applicants rejected? If so, describe the criteria for determining which applications to accept. To date, provide the number of applications submitted and the number of such applications that were given a 10-day or 100-transaction trial of Document Exchange service.

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.


EMMETT RAND COSTICH

Washington, D.C. 20268-0001
July 6, 1999