

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

SIXTH SET OF INTERROGATORIES OF UNITED
PARCEL SERVICE TO UNITED STATES POSTAL SERVICE
(UPS/USPS-46 THROUGH UPS/USPS-49)
(July 15, 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-46. (a) Describe what makes a PostECS transaction an "international," as opposed to a "domestic," transaction, and state all bases for distinguishing a domestic PostECS transaction from an international one.

(b) May PostECS be used to send a message or a document from a sender located in the United States to a recipient located in the United States?

(c) Have there been any PostECS transactions in which a message or a document was sent from a sender located in the United States to a recipient located in the United States?

UPS/USPS-47. For purposes of this question, the terms "Postal Service server" and "Postal Service's server" refer to a server owned or operated by or on behalf of the Postal Service, and the term "foreign top level domain" means a top level domain other than .com, .gov, .org, .net, .edu, .us, and .mil.

(a) Please confirm that when a PostECS user licensed by the Postal Service who has an e-mail address that does not contain a foreign top level domain name sends a message or a document to a recipient with an e-mail address that does not contain a foreign top level domain name, the Postal Service server from which the recipient retrieves the message or document will be located in the United States. If you do not confirm, please explain why.

(b) Please confirm that whenever a message or document is sent by a PostECS user licensed by the Postal Service to an e-mail address that does not contain a foreign top level domain name, the destination Postal Service server from which the recipient retrieves the message will be located in the United States. If you do not confirm, please explain why.

(c) Please confirm that whenever a message or document is sent by a PostECS user licensed by the Postal Service, the Postal Service server to which the sender sends the document is located in the United States. If you do not confirm, please explain why.

(d) Please confirm that whenever a message or document is sent by a PostECS user licensed by the Postal Service who has an e-mail address that does not contain a foreign top level domain name, the message or document does not go to a server owned or operated by or on behalf of a foreign postal administration but rather goes to the Postal Service's server. If you do not confirm, please explain why.

(e) Please confirm that whenever a message or document is sent by a PostECS user licensed by the Postal Service, the message or document does not go to

a server owned or operated by or on behalf of a foreign postal administration but rather goes to the Postal Service's server.

(f) Is the Postal Service able, electronically or otherwise, to identify PostECS messages and documents addressed from a sender with an e-mail address that does not contain a foreign top level domain name to a recipient whose e-mail address does not contain a foreign top level domain name? If so, state the number of such PostECS transactions and the proportion of all PostECS transactions which they represent.

UPS/USPS-48. (a) Are any of the hardware, software, equipment, or other resources used to provide PostECS also used in connection with Mailing Online? If so, identify all such shared common inputs.

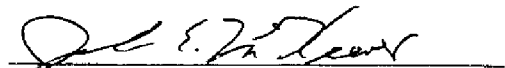
(b) Are any of the hardware, software, equipment, or other resources used to provide PostECS also used in connection with Post Office Online? If so, identify all such shared common inputs.

UPS/USPS-49. (a) Does the Postal Service charge or quote different prices for international PostECS transactions than for otherwise identical domestic PostECS transactions? If so, state how the Postal Service determines whether the international or the domestic price or quote applies.

(b) Has the Postal Service ever charged or quoted different prices for international PostECS transactions than for otherwise identical domestic PostECS

transactions? If so, state how the Postal Service determined whether the international or the domestic price or quote applied.

Respectfully submitted,



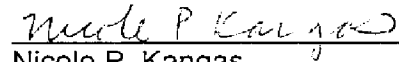
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Of Counsel.

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.



Nicole P. Kangas

Dated: July 15, 1999
Philadelphia, PA