

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.

Docket No. C99-1

**UNITED STATES POSTAL SERVICE
RESPONSE TO UNITED PARCEL SERVICE
INTERROGATORIES UPS/USPS-1(A), 3(A), 5(A) (IN PART), 9, 18, 19, 20(B), 35
(July 20, 1999)**

As explained in the Report of the Meeting between the United States Postal Service and United Parcel Service in Response to Presiding Officer's Ruling No. C99-1/3, filed on July 14, the United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS—1(a), 3(a), 5(a) (in part), 9, 18, 19, and 20(b), filed on May 14, 1999, and interrogatory UPS/USPS—35, filed on June 23, 1999. In providing these responses, the Postal Service does not intend to waive its position that the Postal Service's Motion to Dismiss this proceeding should have been granted.

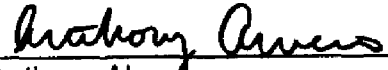
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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July 20, 1999

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-1.

- a) What was the date that Post ECS was first offered to any customer or potential customer?**
- b) Which Postal Service departments, divisions, or other units were or are involved in developing, implementing, providing, and offering PostECS service?**
- c) Describe all of the functions and responsibilities of each of the Postal Service departments, divisions, or units which play, or have played, any role in either the development, implementation, provision, or sale of PostECS.**

RESPONSE:

a) May 20, 1998.

b-c) Objection filed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-3. Of the total number of Post ECS transactions that have taken place to date, what proportion involved:

- a) both a sender located in the United States and a recipient located in the United States
- b) a sender located in the United States and a recipient not located in the United States;
- c) a sender not located in the United States and a recipient located in the United States?

RESPONSE:

a) The Postal Service has no mechanism to quantify the number of transactions involving a sender and recipient located anywhere in the United States (or anywhere else in the world). Post ECS is accessible via the Internet. Consequently, a sender can access Post ECS from anywhere in the world. It is therefore not possible to determine if the sender is physically located in the United States when using Post ECS. Also, it is impossible to ascertain from an e-mail address the actual physical location of a sender or recipient, or where they reside.

b-c) Objection filed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-5. Provide all documents (other than Technical Materials) referring or relating to Post E.C.S., including but not limited to:

- a) Promotional materials, coupons, advertisements, solicitations, and other similar items (the names of customers or potential customers need not be provided);
- b) Instructions to Postal Service or contractor personnel involved in selling, promoting, providing, or answering inquiries concerning, PostECS;
- c) Motivational tools, training materials, and any other similar materials for Postal Service or contractor personnel;
- d) Communications sent to any customers or potential customer, by mail or by any other form of delivery, including by wholly electronic means (the names of customers or potential customers need not be provided);
- e) Plans for the future marketing of PostECS;
- f) Any surveys of customers or potential customers or market studies concerning PostECS; and
- g) Plans for the future provision of PostECS.

RESPONSE:

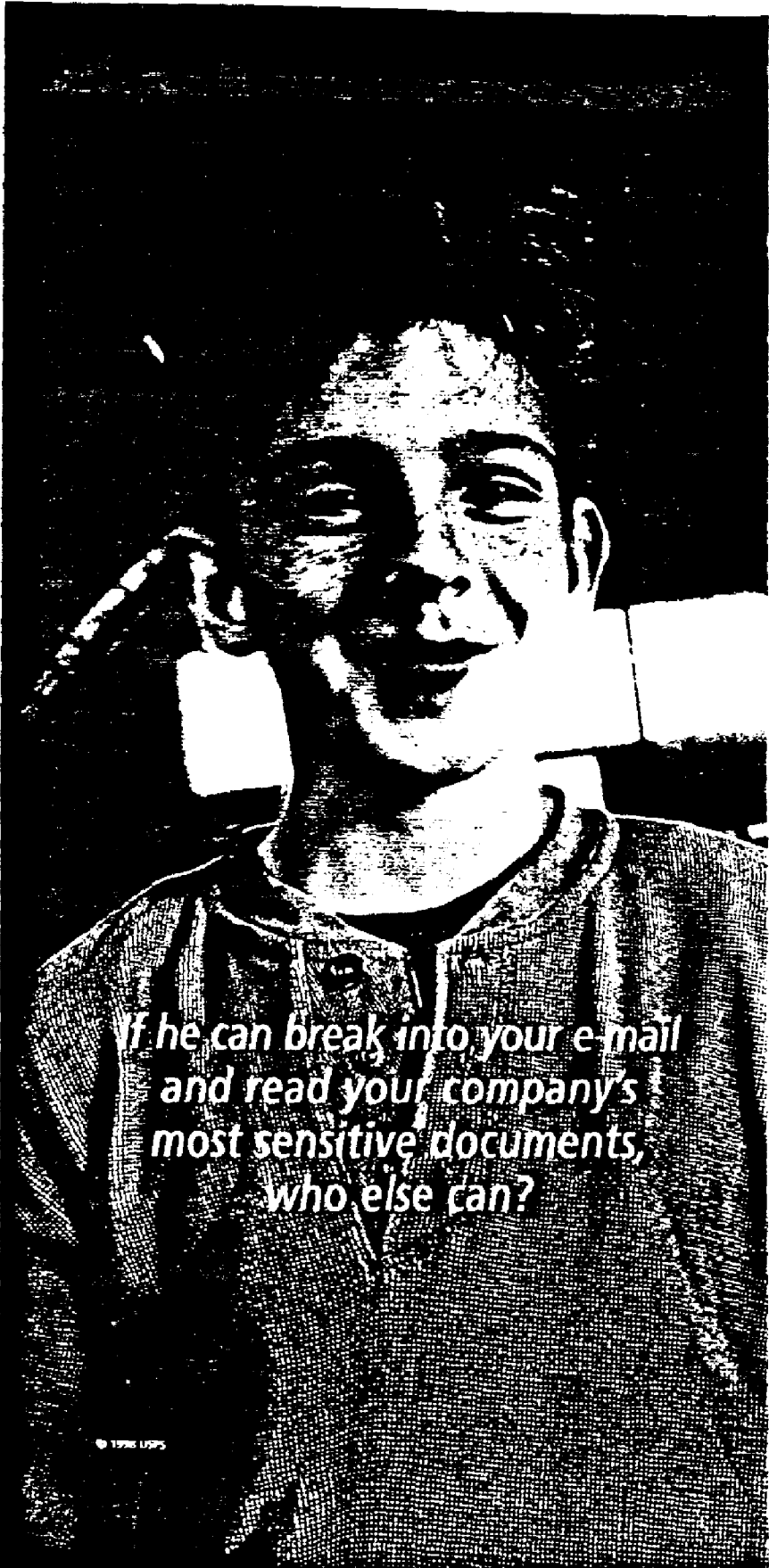
a) A partial objection to this interrogatory has been filed.

Mass media or widely distributed advertising for Post E.C.S. is attached. Although not considered advertising, the Postal Service website at <http://www.usps.gov/postecs/> contains information about Post E.C.S. Copies of the portions of the website containing product descriptions are attached.

Introductory subpart & subparts b-g) Objection filed.

ATTACHMENTS TO UPS/USPS-5(A)

21 PAGES



*If he can break into your e-mail
and read your company's
most sensitive documents,
who else can?*

© 1996 USPS

With Post Electronic Courier Service – Post E.C.S. – you'll soon be rethinking how you send your company's most sensitive documents.

Post E.C.S. gives you fast, secure, confidential document delivery over the Internet – at a fraction of overnight delivery costs.

With Post E.C.S., you can feel confident that your documents are protected with multiple levels of security and rest assured because Post E.C.S. overcomes the problems of incompatible systems and unreadable attachments.

And at the end of the day you can relax, having confirmed your business partners and customers received what you sent. Soon, Post E.C.S. will include the additional capabilities of tamper detection and an official time and date stamp. The bottom line – Post E.C.S. promises the traditional reliability you've come to trust from the United States Postal Service. Post E.C.S. is currently available in a pilot program. For more details, call 888-377-8675.



We deliver.

**Post E.C.S.
(Post Electronic Courier Service)
is the 21st-century
document-delivery system**

**Fast, inexpensive
document delivery**

**Reliable, global
delivery capabilities and
universal compatibility**

**Secure, private and
confidential transmission
over the Internet**

Universal readability

For more information, contact

For organizations committed to ongoing business-process improvement, Post E.C.S. is the 21st-century document-delivery system that is superior to current delivery options. Post E.C.S. combines the advantages of couriers, fax and the Internet with the protection of the United States Postal Service for a fraction of courier delivery costs. Sign up now for a 30-day free trial!

- Post E.C.S. allows you to send and receive your business documents quickly at a substantial cost savings compared to overnight and courier services.
- Post E.C.S. augments your electronic messaging service to deliver documents across multiple systems to business partners and customers outside your corporate Intranet. Post E.C.S. utilizes electronic mail extensively for notification purposes, but makes only the most basic assumptions about the set of services e-mail can provide, thereby not risking incompatibilities across diverse e-mail systems, gateways and clients.
- Post E.C.S. provides several levels of security, from password protection at origin and destination to secured SSL or PCT Internet connections and optional RSA (RC4) file-encryption on the Post E.C.S. server.
- Post E.C.S. enables recipients to read any document sent, regardless of the software applications used.
- Post E.C.S. is currently available in market test. Post E.C.S. will soon offer the Electronic Postmark™ system, which combines tamper-detection with an official time-and-date stamp. This promises the traditional reliability you've come to trust with the United States Postal Service. Post E.C.S. is easy to use, and you can begin using it almost immediately.

■ Tony Otten, Tactical Marketing and Sales Development
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Phone: (888) 377-8675

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**Fast, inexpensive
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**Secure, private and
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over the Internet**

Tracking

For organizations committed to ongoing business-process improvement, Post E.C.S. is a superior 21st-century document-delivery system. Post E.C.S. combines the advantages of couriers, fax and the Internet with the protection of the United States Postal Service for a fraction of courier delivery costs. Sign up now for a free trial!

- Post E.C.S. allows you to send and receive your business documents quickly at a substantial cost savings compared to overnight and courier services.
- Post E.C.S. augments your electronic messaging service to deliver documents across multiple systems to business partners and customers outside your corporate Intranet. Post E.C.S. utilizes electronic mail extensively for notification purposes, but makes only the most basic assumptions about the set of services e-mail can provide, thereby not risking incompatibilities across diverse e-mail systems, gateways and clients.
- Post E.C.S. provides several levels of security, from password protection at origin and destination to secured SSL or PCT Internet connections and optional RSA (RC4) file-encryption on the Post E.C.S. server. In addition, Post E.C.S. enables you to control the duration of availability for files you've sent by using delivery notification and expiration options.
- Post E.C.S. provides status information such as the time a document was sent and received. It also provides notification as to whether a delivery was successful or not.

Universal Readability

- Post E.C.S. also handles readability issues by allowing senders to use Adobe Acrobat® portable document format technology. This feature enables recipients to read any document regardless of the software applications used to create them.

**Electronic Postmark.™
digital authentication seal**

- Post E.C.S. is currently available in market test. Post E.C.S. now features the Electronic Postmark digital authentication seal which combines tamper-detection with an official time-and-date. For year 2000 compliance, the Electronic Postmark system assures the correct time and date will be applied to your transactions every time. This promises the traditional reliability you've come to trust with the United States Postal Service.

For more information, contact

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Fax: (650) 345-7968
e-mail: jotten1@email.usps.gov
or the Post E.C.S. Team
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or by email at postecs@email.usps.gov

www.usps.com

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- Post E.C.S. allows you to send and receive your business documents quickly at a substantial cost savings compared to overnight and courier services.
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■ Robert P. Greenwald, Tactical Marketing and Sales Development
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Post_eCS™
Internet Services

Fact Sheet

Reliable, global delivery capabilities and universal compatibility

Post_eCS™ augments your electronic messaging service to deliver documents across multiple systems to business partners and customers outside your corporate intranet. Post_eCS utilizes electronic mail extensively for notification purposes, but makes only the most basic assumptions about the set of services e-mail can provide, thereby not risking incompatibility across diverse e-mail systems, gateways and clients.

Universal readability

Post_eCS also handles readability issues by allowing senders to use Adobe Acrobat® portable document-format technology. This feature enables recipients to read any document, regardless of the software applications used to create it.

For more information, contact
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Post_eCS Team
Phone: 888-377-8675
e-mail: postecs@email.usps.gov
URL: www.usps.com

Post_eCS™

Post_eCS™
Internet Services

Fact Sheet



*Secure,
private and
confidential
transmission
over the
Internet.*

For organizations committed to ongoing business process improvement, Post_eCS™ (Post Electronic Courier Service) is a superior 21st century document-delivery system. Post_eCS combines the advantages of couriers, faxes and the Internet with the protection of the United States Postal Service — for a fraction of courier delivery costs. Sign up now for a free trial!

Fast, inexpensive document delivery

Post_eCS allows you to send and receive your business documents quickly at a substantial cost savings compared to overnight and courier services.

Secure, private and confidential transmission over the Internet

Post_eCS provides several levels of security, from password protection at origin and destination, to secured SSL or PCT Internet connections and optional RSA (RC4) file encryption on the Post_eCS server.

In addition, Post_eCS enables you to control the duration of availability of files you've sent by using delivery notification and expiration options.

USPS Electronic Postmark™ digital authentication seal

Post_eCS is currently available in a market test. Post_eCS now features the USPS Electronic Postmark digital authentication seal, which combines tamper-detection with an official time-and-date stamp. For year 2000 compliance, the USPS Electronic Postmark service assures that the correct time-and-date stamp will be applied to your transactions every time. This promises the reliability you've come to count on with the United States Postal Service.

Tracking

Post_eCS provides status information, such as when a document was sent and received. It also provides notification as to whether a delivery was successful or not.

Post_eCS™

7



Search Stamps Track/Confirm ZIP Codes
Rate Calculator Change of Address Home

Business



Making it Our Business to Help Yours

Address Quality Products & Services

Learn how accurate mailing list management, mailpiece addressing and barcoding can improve your delivery service and lower your mailing costs.

Track/Confirm

Has it been delivered? Find out where your Express Mail item is or when your Delivery Confirmation item was delivered by using our easy interactive tool.

Postal Explorer

Information for business mailers. Features updated versions of the Domestic Mail Manual (DMM), International Mail Manual (IMM), and related publications.

PosteCS

PosteCS™ is an Internet-based pilot service that enables you to send electronic files fast, reliably and securely to most anyone in the world.

Business Service Centers

For your convenience. Find one near you. And see what we can do for your bottom line today!

International

Get the latest international mailing and shipping information here. You'll also find rate information and links to Post Offices around the world.

Shipping Supplies Online

Express or Priority. Everything you need to know...and have... to use USPS expedited services. Check them out, here.

Postage Rates and Fees

Complete descriptions and schedules of our rates and fees.

Business Forms

Forms for businesses to make mailing easy.

Direct Mail Advertising

Learn how to increase your business using Advertising Mail.

Priority Mail Global Guaranteed

Get it to Western Europe fast. 2 day delivery guaranteed—we can track and confirm it. Did we mention the lowest published rates in the business?

Business Periodicals & Publications

All those USPS magazines and other "official" publications. A resource for today's business.

Mail Preparation Total Quality Management

Get the latest information on the mailing industry and Postal Service's efforts to help business mailers produce quality mail every time.

Business Operations

Links to our Rapid Information Bulletin Board System (RIBBS) and other Postal Operations web sites.

Selling To The USPS

If selling supplies and services is your business, this visit could prove to be quite beneficial.

Rate Case Information

Rate tables, fact sheets, and information on pending rate changes.

United States Postal Service [Terms of Use](#)
[Text Access](#) is available.



**Who else can read your
most sensitive documents?**

Introducing PostECS — a new document
delivery service that uses an alternate
delivery channel to provide users with
the important advantages of couriers,
fax and the Internet along with the
reliability and assurance of the
U.S. Postal Service.

A Federal Communications Service
currently in pilot by the U.S. Postal Service,
Canada Post and La Poste





Allows you to send
and receive documents
or files as quiddy as
fax, and as conveniently
as email

**For more info call:
1-888-377-8675**



**Universal
Readability**

Integrity of file format
maintained via Adobe
Acrobat plug in
available for universally
readable format

**For more info call:
1-888-377-8675**

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Provides end-to-end
privacy and security
through password
protection, secured
Internet connections
and encryption
capabilities

For more info call:
1-888-377-8675

[The following is a reprint of text from the web site www.usps.gov/postecs/. The text printed below contains Post E.C.S. product descriptions. This is copied and reprinted below due to the fact that white font is used on the web site]

PosteCS is a new Internet-based document delivery service designed to support secure electronic communications. PosteCS was developed through a cooperative agreement between the United States Postal Service, Canada Post, and La Poste under the direction of the International Post Corporation.

The PosteCS™ service enables you to send any type of electronic file over the Internet in a fast, reliable and secure method to most anyone with an email account and a Web browser.

Security

The PosteCS™ service offers a variety of security options such as encryption, password protection, connection through a secure sockets layer and the ability to set document expiration dates to help protect your important, competitive or sensitive information.

The Electronic Postmark™ System

In addition, the PosteCS™ service now has the Electronic Postmark™ digital authentication seal which combines tamper detection with an official time-and-date seal. This promises the same reliability and assurance you've come to trust from the United States Postal Service.

PosteCS augments your electronic messaging service to deliver documents across multiple systems to business partners and customers outside your corporate Intranet. PosteCS utilizes electronic mail extensively for notification purposes, thereby not risking incompatibilities across diverse e-mail systems, gateways and clients. The PosteCS notification contains the unique web address where the recipient accesses their PosteCS message and files sent.

PosteCS provides several levels of security, from password protection at origin and destination to secured SSL or PCT Internet connections and optional RSA (RC4) file-encryption on the PosteCS server.

PosteCS enables recipients to read most any document sent, regardless of the software applications used.

As a sender

Those who wish to use the PosteCS service will need to establish an account prior to sending the first file. From that point, it will be a matter of simply specifying the email address or addresses to which the documents will be sent. You also have the option to add several security layers along with delivery confirmation before sending it to the recipients. The document will then be uploaded to the PosteCS service system, which dynamically generates an email notice to the receiver including a unique Web address (URL) to access the PosteCS document.

As a receiver

You receive notification via email specifying a unique URL where a PosteCS™ "document" is waiting. The file is downloaded through a Web connection into the recipient's Web browser. Importantly, the file is not sent as an email file attachment, so it won't be stripped by gateways or mangled by encoding. The PosteCS™ service combines the ubiquity of email for notification with the more reliable file transfer capabilities of the Web, assuring delivery of your documents. The amount of time in which the "document" is available may be limited if the sender has, for security reasons, imposed a time available restriction.

Security and Confidentiality

For those important documents that require security from the moment they leave the sender's desktop until they arrive on the intended receiver's desktop, the PosteCS™ service employs a combination of industry standards and proprietary security measures.

Secure Sockets Layer (SSL) Encryption - To protect against interception of any delivery information during transit to and from the server, a secure, encrypted connection on the server is established through Secure Sockets Layer (SSL) or Private Communication Technology (PCT).

Server Authentication - PosteCS™ service authenticates the secure Postal server before uploading the document via a server digital certificate.

RSA 40-bit Encryption Technology - While the document awaits retrieval by the receiver, the server employs proprietary security measures to encrypt the document adding protection from potential intruders.

Document Expiration - Senders can also set an expiration date ensuring the document is deleted from the server automatically.

Password Protection - The sender also may specify a private password for each delivery thereby enabling the authentication of the receivers on the basis of whether or not they know the correct password. The password is not stored on the server. Combined with server level encryption, this makes it extremely difficult for an unauthorized user to gain access to the PosteCS™ document.

ENHANCEMENTS to the PosteCS™ service

Enhancements are being developed that incorporate public key technology enabling end-to-end encryption, digital signature, and user digital certificates. With end-to-end encryption, the

encrypted document cannot be compromised even if the system were to be compromised. A digital signature provides additional security services such as:

Authentication - Both sender and receiver may have interest in verifying the identity of the other party. In the digital world, this can be achieved by using public key digital certificates to create digital signatures. Certificates bind individuals to their private key, which can be authenticated using a corresponding public key. PosteCS has plans for integration of public/private key technology in the future.

Content Integrity - Both senders and receivers of important documents may require assurances that the document was not altered during transmission. This can be accomplished in two different ways. First, through the Electronic Postmark™ system, the recipient of a documents sent can verify whether or not the document was tampered with enroute adding a means to verify the integrity of files sent via PosteCS. And in the future, with public and private key technology the risk of file alteration can be minimized through encrypting the document with the sender's private key or using a digital signature to compute a hash or message digest encrypted with the sender's private key. The receiver either decrypts the document or verifies the signature using the sender's public key.

Validation - For legal purposes, individuals may require the system to provide validation of transaction. The validation may be the integrity of content, time of delivery, and in the future, the authenticity of the parties involved. The PosteCS™ service incorporates the United States Postal Service's Electronic Postmark™ service, combining tamper detection with an official time-and-date stamp, promising the reliability you've come to trust with the United

States Postal Service.

17

Special Features

Real-time Tracking and Tracing

Deliveries can be tracked and traced through every step of the process. Real-time tracking shows when documents were sent, when receivers were notified, and when they received the documents. Automatic or customized delivery reports can be generated.

Universal Compatibility

The PosteCS™ service allows you to send most any file type (word processing document, multi-media files, application, etc.) to anyone with an email address and a Web browser. The sender has the option to convert the file automatically into the Adobe Acrobat® Portable Document Format (PDF) which addresses the problem of viewing files without the original application and fonts. In this way, the recipient can receive documents via the PosteCS™ service regardless of platform, email system, or document type.

Robust Email-List Management

The PosteCS™ service allows the management of large email distribution lists or email-lists merged from your existing databases. Using the PosteCS™ desktop, you have easy access to all of your email-lists or your local email address books.

Billing

Users will receive one monthly invoice for the PosteCS™ service. The detailed invoices will include a breakdown of the activity, frequency of use and transaction fees.

Best of all - the PosteCS™ service is easy to use and our PosteCS™ service coordinators can have you up and running almost immediately

System Requirements

PosteCS™ Central

A web application allowing users to send and track documents Accessible through a local Web browser (Netscape 2.0 or higher and /or Internet Explorer 4.0 or higher), which communicates with the PosteCS™ server

System Requirements

An Internet connection Netscape Navigator 2.0 (3.0 or 4.0 is recommended) and/or Microsoft Internet Explorer 4.0 Internet browser a PosteCS™ account and password

PosteCS™ Desktop

Software client application extending the functionality of PosteCS Central by integrating delivery capabilities into the user's desktop environments Includes features like conversion to portable document formats, seamless access to address books, and ability to create dedicated "drops" or mail "chutes" to defined and regular recipients.

System Requirements

Windows® 95, Windows® NT 4.0 or higher operating system 8 megabytes of RAM 2.5 megabytes of hard disk space an Internet connection a PosteCS™ service account.

To receive files using the PosteCS™ Service

To receive a document, no propriety software is required. All that is needed is an e-mail address, access to the Web, and a Web browser, (Netscape Navigator 2.0 or higher and/or Microsoft® Internet Explorer 4.0 Internet browser.)

Secure Login

Welcome to PostECS! PostECS is an Internet-based document delivery service that delivers important or sensitive documents from enterprises and individuals to anyone with an email account and a Web browser.



RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-9. Is Post E.C.S. ever offered in conjunction with the provision of, or in conjunction with offers to provide, any postal services? If so, provide all documents relating to such offers or transactions (the names of customers or potential customers need not be provided.)

RESPONSE:

No. Post E.C.S. is not integrated, combined, or offered in conjunction with any postal services.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
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UPS/USPS-18. Does the Postal Service ever provide, or has it ever provided hardcopy proof of delivery of a Post E.C.S. message or document? If so, provide the form of all such proofs of delivery.

RESPONSE:

No.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-19. Is the provision of Post E.C.S. an effort by the Postal Service to counteract the Postal Service's concerns about declining use of hardcopy mail due to the use of faxes, email, or any other services that do not involve hardcopy delivery?

RESPONSE:

While the Postal Service recognizes that the needs of its customers are evolving with new technology, the test of Post E.C.S. is not an effort by the Postal Service to counteract the "declining use of hardcopy mail due to the use of faxes, email, or any other services that do not involve hardcopy delivery." Rather, the test of Post E.C.S. is intended to gauge market acceptance of the service and its features. The service provides enhancements and features that are not offered by hardcopy services, facsimile transmissions, and ordinary e-mail.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-20.

- a) Provide the number of United States users licensed to use PostECS.
- b) Is it possible for a United States user licensed to use Post E.C.S. to originate transactions from (i) more than one location, (ii) anywhere in the United States, (iii) in the United States and also from another country?

RESPONSE:

- a) Objection filed.
- b) It is possible for a USPS-licensed Post E.C.S. user to originate transactions from (i) more than one location, (ii) anywhere in the U.S., and (iii) in the United States and also from another country. Post E.C.S. is an Internet-based service. Therefore, any USPS-licensed user having a login id and password can originate transactions at the point or location where access to the Internet is available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE

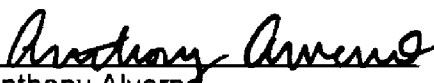
UPS/USPS 35. Is the electronic postmark a service feature available in connection with Post E.C.S., whether as an add-on or as an integral part of the basic service?

RESPONSE:

The USPS Electronic Postmark™ digital authentication system is an optional service feature available in the Post E.C.S. service.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony Alverno

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July 20, 1999