

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
INTERROGATORY UPS/USPS-46(B-C)
(July 29, 1999)**

The United States Postal Service hereby provides the response to the following interrogatory of United Parcel Service: UPS/USPS—46(b-c), filed on July 15, 1999.

Objections to interrogatories UPS/USPS-46(a), 47-49 were filed on July 26, 1999.

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

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.


The undersigned counsel has sent a copy of this document to counsel for UPS via facsimile transmission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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July 29, 1999

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

RESPONSE:

(a) Objection filed.

(b-c) PosteCS™ may be used to send files to recipients with e-mail addresses and access to the Internet. The USPS does not distinguish or monitor the location of recipients. For use of the service, a recipient must have an e-mail address and Internet access. The sender and recipient can therefore be located in any combination of locations.

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 Alvorno

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