

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

SEVENTH SET OF INTERROGATORIES OF UNITED
PARCEL SERVICE TO UNITED STATES POSTAL SERVICE
(UPS/USPS-50 THROUGH UPS/USPS-58)
(August 16, 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-50. (a) Is it the position of the Postal Service that criminal statutes governing the mails such as 18 U.S.C. §§ 1701 ("Obstruction of mails generally"), 1708 ("Theft or receipt of stolen mail matter generally"), and 1735 ("Sexually oriented advertisements") apply to PostECS transactions? If so, please explain.

(b) Is it the position of the Postal Service that the interception of a PostECS message or document by one other than the sender or the addressee violates any federal statute relating to the mails? If so, explain, and identify the relevant statute.

UPS/USPS-51. Please refer to the answer to interrogatory UPS/USPS-46(b-c).

(a) UPS asked in interrogatory UPS/USPS-46(b) whether PostECS may 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. Is the answer to that question "yes"?

(b) UPS asked in interrogatory UPS/USPS-46(c) whether there have 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. Is the answer to that question "yes"?

UPS/USPS-52. (a) Have there been any PostECS transactions in which a message or a document was sent from (i) a sender with an email address containing a top level domain name of .com, .org, .net, or .edu (ii) to an addressee with an email address containing a top level domain name of .com, .org, .net, or .edu?

(b) If the answer to (a), above, is yes, what proportion of all PostECS transactions do such transactions represent?

UPS/USPS-53. Provide copies of all "customer feedback and informal interviews with end users" referred to in the Postal Service's response to question 2(b) posed in Commission Order No. 1229.

UPS/USPS-54. State the proportion of PostECS transactions to date that have involved both (a) users who do not have a foreign top level domain in the domain name of their email addresses and (b) addressees who do not have a foreign top level domain in the domain name of their email addresses.

UPS/USPS-55. Please refer to page 17 of the attachments to the Postal Service's response to interrogatory UPS/USPS-5(A), a copy of which is attached hereto as Attachment A, which suggests under the heading "Validation" that PostECS may provide validation of the "time of delivery."

(a) Does PostECS provide validation of "time of delivery"?

(b) If the answer to (a) is yes, what time is validated as the time of delivery -- the time when the sender's message or document is first lodged on the Postal Service's server, the time the addressee picks up the message or document from the Postal Service's server, or some other time? If the answer is some other time, please state what time that is.

UPS/USPS-56. Is PostECS an effort by the Postal Service to counteract concerns about diversion of hardcopy mail (of whatever type) to electronic forms of communication?

UPS/USPS-57. (a) Did the Postal Service seek the consent of the President to any of its PostECS arrangements or agreements with the International Post Corporation, Canada Post, or LaPoste?

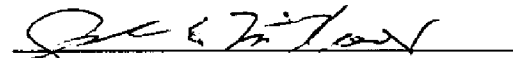
(b) Did the Postal Service seek the consent of the President to any of the rates or prices it is charging for PostECS service?

UPS/USPS-58. (a) Provide the proportion of PostECS transactions to date where the sender had an email address containing a top level domain of .com, .org, .net, or .edu in the domain name of the sender's email address and the message was left for the recipient to retrieve on a server located in the United States.

(b) Provide the proportion of PostECS transactions to date where the sender had an email address containing a top level domain of .com, .org, .net, or .edu in

the domain name of the sender's email address and the message was left for the recipient to retrieve on a server located outside the United States.

Respectfully submitted,



John E. McKeever
Kenneth G. Starling
Nicole P. Kangas
Attorneys for United Parcel Service

PIPER & MARBURY L.L.P.
3400 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103
(215) 656-3300

and

1200 19th Street, N.W.
Washington, DC 20036
(202) 861-3900

Of Counsel.

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

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: August 16, 1999
Philadelphia, PA