

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED

8 24 3 2 PM '99

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT ON POST E.C.S.

DOCKET NO. C99-1

RESPONSE OF UNITED PARCEL SERVICE
TO MOTION OF THE UNITED STATES POSTAL SERVICE
FOR CLARIFICATION OR RECONSIDERATION
REGARDING SUBPART 5(d) OF UPS INTERROGATORIES

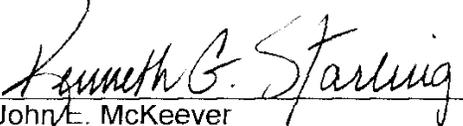
(August 24, 1999)

United Parcel Service hereby responds to the Motion of the United States Postal Service for Extension of Time to File Information Regarding UPS Interrogatories 5, 6, 10, 11, 12, 13, and 14, and for Clarification or Reconsideration Regarding Subpart 5(d), filed August 20, 1999. The Presiding Officer has granted the Postal Service's Motion for Extension of Time to August 30, 1999, and that part of the motion requires no further response.

United Parcel Service has no objection to the proposal of the Postal Service, with respect only to the documents and emails responsive to subpart (d) of Interrogatory UPS/USPS-5, to proceed with its index of privileged documents on a "category" basis. It is the understanding of United Parcel Service that, with respect to all documents responsive to Interrogatories other than subpart 5(d), the Postal Service's index will

provide an entry for each responsive document for which a privilege is asserted.

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
Tel: (215) 656-3300

and

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

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.


Kenneth G. Starling

Dated: August 24, 1999
District of Columbia