

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
RESPONSES TO UNITED PARCEL SERVICE
INTERROGATORIES UPS/USPS-51, 55 and 56
(August 30, 1999)**

In accordance with the special rules of practice, the United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service: UPS/USPS—51, 55 and 56, filed on August 16, 1999. Objections were filed to interrogatories 50, 52-54, and 57-58 on August 26, 1999.

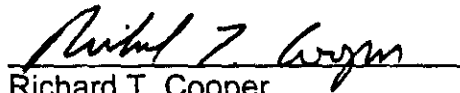
In providing these responses, the Postal Service does not intend to waive its position that the Postal Service's Motion to Dismiss this proceeding should have been granted. The undersigned counsel has sent a copy of this document to counsel for UPS via facsimile transmission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 30, 1999

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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"?

Response:

- a) Yes. As indicated in the response to interrogatory UPS/USPS-46(b), PostECS may be used to send a message or a document from a sender and recipient in any combination of locations, including a sender physically located in the United States and a recipient physically located in the United States.
- b) As indicated in the response to interrogatory UPS/USPS-46(c), the Postal Service does not monitor the locations of sender/recipient combinations. However, the Postal Service does not contest that some messages have been sent from senders physically located in the United States to recipients physically located in the United States.

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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.

RESPONSE:

- a) Yes.
- b) In attachment A, the concept of "Validation" is discussed in the context of the USPS Electronic Postmark™ system enhancement of the PosteCS service. The time referred to is the time the PosteCS package is processed by the USPS Electronic Postmark™ system and the USPS Electronic Postmark digital authentication seal is applied.

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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?

Response:

Not really. While the Postal Service is sensitive to concerns about diversion of hardcopy mail, the primary motivation underlying PostECS is to evaluate customer receptiveness to wholly electronic services offered by the Postal Service and to provide a platform that would enable testing of other electronic services such as Electronic Postmark™.

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.


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