

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

SEP 3 4 11 PM '99

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-59-63
(September 3, 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—59-63, filed on August 20, 1999.

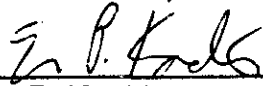
In providing these responses, the Postal Service does not intend to waive its position that the Postal Service's Motion to Dismiss this proceeding should have been granted. The undersigned counsel has sent a copy of this document to counsel for UPS via facsimile transmission.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Eric P. Koetting
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5402
September 3, 1999

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

UPS/USPS-59. (a) Can PostECS be used to send bills or invoices to addressees?

(b) Has PostECS been used to send bills or invoices to addressees?

Response:

(a) PostECS can be used to send most any type of file to addressees.

(b) The Postal Service has no knowledge that PostECS has been used to send bills or invoices to addressees, nor does the Postal Service monitor the types of data sent by customers. The Postal Service does not contest, however, that it is possible that the service has been used for that purpose.

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

UPS/USPS-60. (a) Can PostECS be used to send advertising to addressees?

(b) Has PostECS been used to send advertising to addressees?

RESPONSE:

(a) PosteCS can be used to send most any type of file to addressees.

(b) The Postal Service has no knowledge that PostECS has been used to send "advertising" to addressees, nor does the Postal Service monitor the types of data sent by customers. It is the understanding of the Postal Service that one test participant has used PosteCS to send a notification to its membership audience.

Please refer to the response to UPS/USPS-15.

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

UPS/USPS-61. (a) Can PostECS be used to send to addressees messages that may also be sent by First Class Mail?

(b) Has PostECS been used to send to addressees messages that may also be sent by First Class Mail?

RESPONSE:

(a) PosteCS can be used to send most any type of digital or electronic file to addressees. Therefore, information or content, provided it is in a digital or electronic file format, can be sent via PosteCS.

(b) The Postal Service has no knowledge that PostECS has been used to send to addressees messages that may also have been sent by First-Class Mail. However, given that DMCS section 210 states that "Any matter eligible for mailing may, at the option of the mailer, be mailed as First-Class Mail," the Postal Service does not contest that it is probable that the service has been used for that purpose.

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

UPS/USPS-62. (a) Can PostECS be used to send to addressees messages or documents that may also be sent as Expedited (Express) Mail?

(b) Has PostECS been used to send to addressees messages or documents that may also be sent as Expedited (Express) Mail?

RESPONSE:

(a) PostECS can be used to send most any type of file to addressees.

(b) The Postal Service has no knowledge that PostECS has been used to send to addressees messages or documents that may also be sent as Expedited (Express) Mail. As DMCS section 110 states that "Any matter eligible for mailing may, at the option of the mailer, be mailed as Express Mail," however, the Postal Service does not contest that it is probable that the service has been used for that purpose.

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

UPS/USPS-63. (a) Can PostECS be used to send to addressees messages or documents that may also be sent as certified mail?

(b) Has PostECS been used to send to addressees messages or documents that may also be sent as certified mail?

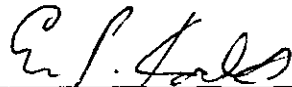
RESPONSE:

(a) PosteCS can be used to send most any type of file to addressees.

(b) The Postal Service has no knowledge that PostECS has been used to send to addressees messages or documents that may also be sent as certified mail. As DMCS section 5.020 states that certified mail is available to any matter mailed as First-Class Mail, and DMCS section 210 states that any matter eligible for mailing may, at the option of the mailer, be mailed as First-Class Mail, the Postal Service does not contest that the service probably has been used to send messages or documents that may also be sent as certified mail.

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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5420
September 3, 1999