

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
UNITED PARCEL SERVICE (UPS/USPS-4)
(August 31, 2006)

The United States Postal Service hereby provides its institutional responses to the following interrogatory of United Parcel Service, filed on August 18, 2006:

UPS/USPS-4

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3037, Fax -5402
Brian.M.Reimer@usps.gov

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-4. Refer to your response to UPS/USPS-T15-2, redirected from witness Kelley. In that response, the Postal Service provided a table containing estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported under the FedEx contract during FY 2005.

(a) Do the estimates in that response include both the Night-turn mode and the Day-turn mode, or only the Day-turn mode?

(b) If the estimates include both the Night-turn and the Day-turn, please provide estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported on the Day-turn mode, and separate estimates of the pieces, pounds, and cubic feet of mail, by mail class, transported on the Night-turn mode.

(c) Provide the same data as is requested in paragraph (b), above, separately for FY 2002, FY 2003, and FY 2004.

RESPONSE:

(a). Yes. The table includes both the Night-turn and the Day-turn.

(b)-(c). Estimates of pieces, pounds and cubic feet of mail by mail class transported for years FY 2002 through FY 2005 are provided in the tables on the following pages.

Cubic feet are not tracked for the Night-turn.

Response to UPS/USPS-4

Network Air Estimated Pounds Years 2002-2005

Mode	Category	Pounds FY02	Pounds FY03	Pounds FY04	Pounds FY05
Day Turn	First Class Mail	229,652,587	356,317,509	436,236,198	422,543,675
	Domestic Priority	797,965,751	759,555,426	794,181,864	836,346,738
	Domestic Express	3,312,948	5,588,066	6,356,417	10,577,476
	Periodicals	7,972,141	10,462,772	13,654,561	15,360,225
	Standard Mail	10,312,358	13,920,686	23,363,625	21,188,260
	Package Services	7,220,690	6,303,453	9,131,071	9,791,086
	USPS Mail	2,385,815	3,938,517	4,312,744	7,892,981
	Free Mail	459,498	1,501,675	1,577,274	1,568,650
	International	18,610,405	23,304,465	31,423,882	31,949,037
Night Turn	First Class Mail	2,499,361	7,112,637	3,348,476	2,252,601
	Domestic Priority	1,433,963	2,143,772	837,515	197,411
	Domestic Express	43,321,171	45,679,018	42,170,471	43,952,973
	Periodicals	11,362	161,285	313,842	231,093
	Standard Mail	16,109	270,150	429,077	389,688
	Package Services	5,224	32,446	30,041	29,654
	USPS Mail	46,869	634,696	1,069,783	3,150,399
	Free Mail	0	0	0	229
	International	11,567,743	10,742,159	23,054,275	26,589,103

Response to UPS/USPS-4

Network Air Estimated Pieces for Years 2002-2005

Mode	Category	Pieces FY02	Pieces FY03	Pieces FY04	Pieces FY05
Day Turn	First Class Mail	3,986,435,933	6,809,552,956	7,435,688,299	7,090,053,101
	Domestic Priority	367,966,383	341,878,872	329,317,081	347,318,752
	Domestic Express	2,975,626	1,915,105	2,187,469	7,288,407
	Periodicals	16,627,491	25,263,442	29,747,751	33,525,787
	Standard Mail	95,816,288	152,399,559	266,887,422	238,329,231
	Package Services	4,168,877	3,360,651	5,352,574	5,753,569
	USPS Mail	12,047,280	10,243,643	40,392,257	53,635,348
	Free Mail	678,848	7,025,736	2,771,364	3,603,881
	International	35,986,423	51,747,292	57,296,002	49,451,340
Night Turn	First Class Mail	46,011,550	158,209,129	66,364,574	48,990,891
	Domestic Priority	795,396	642,639	273,981	105,282
	Domestic Express	28,118,486	35,263,486	19,604,084	21,416,977
	Periodicals	125,066	220,494	747,835	523,868
	Standard Mail	392,072	1,378,857	4,958,093	4,390,971
	Package Services	2,620	58,489	15,167	18,471
	USPS Mail	6,015	86,619	271,067	796,216
	Free Mail	0	15,436	0	2,417
	International	6,910,083	4,491,957	9,110,667	12,098,991

Response to UPS/USPS-4

Network Air Day-Turn Estimated Cubic Feet for Years 2002-2005

Mode	Category	Cubic Feet FY02	Cubic Feet FY03	Cubic Feet FY04	Cubic Feet FY05
Day Turn	First Class Mail	25,554,581	34,929,609	43,995,486	45,474,064
	Domestic Priority	144,129,098	139,025,189	144,785,083	161,733,521
	Domestic Express	395,262	531,956	778,605	1,032,523
	Periodicals	1,095,698	1,085,156	1,629,204	1,740,564
	Standard Mail	1,272,953	1,388,973	2,537,688	2,225,172
	Package Services	1,192,240	900,973	1,370,828	1,555,935
	USPS Mail	406,560	693,237	706,563	1,323,682
	Free Mail	83,643	166,376	240,238	240,345
	International	2,812,158	3,401,480	4,363,195	5,126,497

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Brian M. Reimer

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Washington, D.C. 20260-1137
(202) 268-3037, FAX: -5402
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Brian.M.Reimer@usps.gov