

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS SCHERER TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T30-10)

The United States Postal Service hereby provides the response of witness Scherer to the following interrogatory of United Parcel Service: UPS/USPS-T30-10, filed on December 10, 2001. Objections to interrogatories UPS/USPS-T30-9 and 11 were filed on December 20, 2001.

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:



Susan M. Duchek

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December 26, 2001

**RESPONSE OF POSTAL SERVICE WITNESS SCHERER  
TO UPS INTERROGATORY**

**UPS/USPS-T30-10.** Refer to page 5 of your testimony, USPS-T-30, where you state that the definition of the second-day and third-day air market does not include ground services. How is the second-day and third-day air market defined?

**RESPONSE:**

I am informed that the "second-day and third-day air market" is defined by The Colography Group, Inc. to include package delivery services that are "deferred" (vs. overnight) and that use air or ground transportation as appropriate to meet specified service commitments. The major products in this market are Priority Mail, FedEx 2 Day, FedEx Express Saver, UPS 2<sup>nd</sup> Day Air, UPS 3 Day Select, and Airborne 2<sup>nd</sup> Day Service.

**DECLARATION**

I, Thomas M. Scherer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Thomas M. Scherer  
THOMAS M. SCHERER

Dated: 12/26/01

## 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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Susan M. Duchek

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