BEFORE THE RECEIVED POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-60047 4 37 PM 396

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO (APWU/USPS-1-2)

The United States Postal Service hereby provides responses to the following interrogatories of the American Postal Workers Union, AFL-CIO: APWU/USPS-1-2, filed on August 13, 1996.

Each 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

Anthony F. Alverr

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2997; Fax –5402 August 27, 1996



RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO

APWU/USPS-1 When the United States Postal Service was formed after the Postal Reorganization Act was enacted, what service provided the "most expeditions handling and transportation afforded mail matter by the Postal Service?"

RESPONSE:

Airmail and/or airmail with special delivery.

RESPONSE OF UNITED STATES POSTAL SERVICE: TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO

APWU/USPS-2 Referring to page one of the Postal Service's Request for a Recommended Decision, what "new data and analysis obtained since the last rate case "indicates that eliminating Special Delivery service will "better meet customer needs and reflect costs and customer demands"? Please provide copies of all such data and any such analysis.

RESPONSE:

See USPS-T-1 at 4, 5; Response of witness Lyons to OCA/USPS-T8-7(c);

Exhibit USPS-T-1A; USPS-T-2 at 7-8; USPS-T-8 at 116-36.

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.

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 August 27, 1996