

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

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS STEPHEN B. HAGENSTEIN TO MAILERS HUB INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS MH/USPS-T2-3 (REDIRECTED FROM WITNESS WHITEMAN)

The United States Postal Service hereby provides the response of witness Stephen B. Hagenstein to the above-listed interrogatory. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

Anthony Alverno
Chief Counsel, Global Business & Service
Development

Ian Brown
Peter J. McNulty
B.J. Meadows, III

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-6706
ian.d.brown@usps.gov
June 1, 2021

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HAGENSTEIN
TO INTERROGATORIES OF MAILERS HUB (REDIRECTED FROM WITNESS
WHITEMAN)**

MH/USPS-T2-3. [POR #7] Please refer to Part II of Witness Hagenstein's testimony and your testimony on Pages 11 through 13.

- a. Please confirm that the calculated savings in surface transportation assumed:
 - i. all vehicles (trucks) would be the same size, with the same capacity;
 - ii. cube utilization would be 45.1% of the capacity of a 53-foot trailer;
 - iii. loads would consist solely of APCs with an average utilization of 75%; and
 - iv. no loads would be in other containers or bedloaded.
- b. If those assumptions cannot be confirmed please explain what assumptions were used.

RESPONSE:

- a. Partially confirmed
- b. The equipment used in the model was 53-foot trailers. Cubic foot utilization of trailers were limited to approximately 45.1%, or the equivalent of a full floor-load using commonly used Mail Transport Equipment (MTE). Loads during implementation would not consist solely of APCs; however, APCs were the only equipment used in the model as a way to estimate trailer capacity occupied by Mail Transport Equipment (MTE). Piece-level volumes were converted to APCs limited to 75% capacity of the APCs, under the assumption that not every APC would be 100% full. Bedloads and other containers were not used in the model to determine trip requirements.