

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

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS ROBINSON TO INTERROGATORIES OF
DOUGLAS F. CARLSON
(DFC/USPS-T34-1-3)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatories of Douglas F. Carlson: DFC/USPS-T34-1-3, filed on January 24, 2000.

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


Richard T Cooper

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Washington, D.C. 20260-1137
February 7, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T34-1. Please provide the location (including the exact city in which the facility is located) of each of the 10 Priority Mail Processing Centers and all the three-digit ZIP Codes that each PMPC serves.

RESPONSE:

<u>PMPC</u>	<u>Location</u>	<u>ZIP Codes Served</u>
Miami PMPC	Miami, FL 33172-2306	330, 331-332-340, 333, 334, 349
Jacksonville PMPC	Jacksonville, FL 32219-3239	299, 313-314, 315, 316, 320, 322, 321, 323, 324, 326, 344
Orlando PMPC	Orlando, FL 32824-7952	327, 328-329, 347, 335-336, 346, 337, 338, 339, 341, 342
Northern New Jersey PMPC	Kearny, NJ 07032-4306	068-069, 00102, 070-073, 074-075, 076, 077, 087, 078-079, 085-086, 088-089, 105-108, 109, 124, 125-127
Springfield PMPC	Springfield, MA 01104-3208	010-011, 013, 012, 060-061, 062, 063, 064-065, 066, 067, 120-123, 128, 129
Rochester PMPC	Rochester, NY 14606-2312	130-132, 133-135, 136, 137-139, 140-143, 144-146, 147, 148-149

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<u>PMPC</u>	<u>Location</u>	<u>ZIP Codes Served</u>
Pittsburgh PMPC	Warrendale, PA 15086-7531	150-152, 153, 154, 156, 158, 155,157,159, 160- 162, 163, 164-165, 166, 168, 167, 250-253, 260, 261, 262-265, 266, 268
Philadelphia Metro PMPC	Swedesboro, NJ 08085-1708	080-084, 170-172, 178, 173-176, 169, 177, 179, 180-181, 183, 184-185, 188, 182, 186-187, 189, 193-194, 190-192, 195- 196, 197-199
Metro NY PMPC	Bethpage, NY 11714-3566	100-102, 104, 110,113- 114, 116, 111, 103, 112, 115, 005, 117-119
Nashua PMPC	10 Celina Avenue Nashua, NH 03063-1015	014-017, 018-019, 055, 021-022, 020-023-024, 025-026, 027-029, 030- 034, 038-039, 040- 043,045,048, 044, 046, 047, 049, 035-037,050- 053,057-059, 054, 056

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
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DFC/USPS-T34-2. Please refer to footnote 9 in your testimony at page 16. Please explain why the flat-rate envelope would be priced at the two-pound rate, even for a flat-rate envelope that contained documents that weighed one pound or less.

RESPONSE:

The Priority Mail flat-rate envelope is a convenience product that allows customers to prepare and mail a Priority Mail piece without determining the actual weight and zone of the piece and the corresponding postage for that weight and zone. Customers who are price sensitive and wish to use the one-pound rate for documents weighing one pound or less may do so by using any appropriate packaging material other than the flat-rate envelope.

In Docket No. R90-1, the Postal Rate Commission recommended a rate for the Priority Mail flat-rate envelope stating "the additional convenience it provides will enhance the value of the service to the customers, especially the small-volume and household users. This is a proposal which simplifies customers' transactions with the Postal Service if they choose to take advantage of it." [Docket No. R90-1, PRC Op. at V-98, para. 5221]

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DFC/USPS-T34-3. Please provide all data concerning the actual weight of flat-rate envelopes that customers mail under current postage rates.

RESPONSE:

The data below is from an RPW special weight report for GFY 1998. The data is available in electronic format in USPS-LR-I-165, Priority Mail Pricing Spreadsheets, USPST34A.xls, worksheet "Input Data," cell range A118::E153.

<u>Ounce Increment</u>	<u>Flat Rate Envelope Volume</u>
0.001-1.000	3,267,416
1.001-2.000	19,126,400
2.001-3.000	11,930,814
3.001-4.000	8,227,460
4.001-5.000	6,910,483
5.001-6.000	5,267,363
6.001-7.000	4,387,424
7.001-8.000	3,711,186
8.001-9.000	3,703,285
9.001-10.000	3,503,828
10.001-11.000	3,421,208
11.001-12.000	4,185,505
12.001-13.000	4,329,216
13.001-14.000	4,252,744
14.001-15.000	3,233,383
15.001-16.000	2,890,377
16.001-17.000	3,010,064
17.001-18.000	2,652,809
18.001-19.000	2,281,426
19.001-20.000	1,790,850
20.001-21.000	1,660,130
21.001-22.000	1,445,749
22.001-23.000	1,508,339
23.001-24.000	1,320,774
24.001-25.000	1,120,700
25.001-26.000	970,750
26.001-27.000	841,025
27.001-28.000	946,470
28.001-29.000	712,902
29.001-30.000	696,428
30.001-31.000	585,522
31.001-32.000	566,692
32.001-99999	<u>5,475,431</u>
Total	119,934,151

DECLARATION

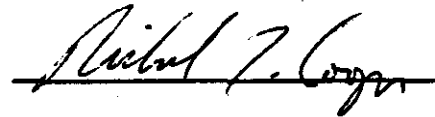
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


MAURA ROBINSON

Dated: 2-7-00

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.

A handwritten signature in black ink, which appears to read "Michael J. Goggin", is written over a solid horizontal line.

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