

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, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MAYO TO INTERROGATORIES OF  
THE ASSOCIATION OF PRIORITY MAIL USERS, INC.  
(APMU/USPS-T39-1(A) AND APMU/USPS-T34-27, 29,  
REDIRECTED FROM WITNESS ROBINSON)

The United States Postal Service hereby provides the response of witness Mayo to the following interrogatories of the Association of Priority Mail Users, Inc.:

APMU/USPS-T39-1, filed on March 2, 2000; and APMU/USPS-T34-27 and 29, filed on March 2, 2000, and redirected from witness Robinson. Interrogatory APMU/USPS-T39-1(b-e) was redirected to the Postal Service.

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



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March 16, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO  
TO INTERROGATORY OF ASSOCIATION OF PRIORITY MAIL USERS, INC.  
(APMU/USPS-T39-1)**

**APMU/USPS-T39-1.** Please refer to your testimony at page 57, ll. 4-6, where you state that delivery confirmation data "provide an additional management diagnostic tool in assessing parcel delivery and areas for improvement."

- a. Please describe how management uses delivery confirmation data as a diagnostic tool.
- b. What corrective action, if any, has management taken in response to delivery confirmation data?
- c. Does management use PETE or Priority Mail ODIS data as a diagnostic tool? If so, what corrective action, if any, has management taken in response to these data?
- d. Do delivery confirmation data ever conflict with PETE or Priority Mail ODIS data? If so, what weight is placed on the respective data?
- e. Are delivery confirmation data used to monitor Emery's performance under the PMPC contract?

**RESPONSE:**

- a. Management uses a variety of diagnostic tools for assessing parcel delivery and opportunities for improvement. These include those mentioned in part (c) along with customer complaints. The latest of these tools is Delivery Confirmation, but there is no formalized use of Delivery Confirmation data to measure the quality of parcel delivery service. Please see the Postal Service's response to parts b-c of this interrogatory.
- b. Redirected to the United States Postal Service.
- c. Redirected to the United States Postal Service.
- d. Redirected to the United States Postal Service.
- e. Redirected to the United States Postal Service.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO  
TO INTERROGATORIES OF ASSOCIATION OF PRIORITY MAIL USERS, INC.  
REDIRECTED FROM WITNESS ROBINSON  
(APMU/USPS-T34-27)**

**APMU/USPS-T34-27.** Please refer to pages 19 and 20 of your testimony. You state that you project delivery confirmation volumes associated with Priority Mail based (in part) on the adoption curve proposed by USPS witness Sharkey in Docket No. R97-1. Does your projection of TYAR manual delivery confirmation usage with Priority Mail reflect the proposed 14 percent increase in those rates? If so, what are the before and after rates usages which you use?

**RESPONSE:**

No. Please see USPS-T-39, WP-10 in Library Reference I-168. I assume there is no volume change from Test Year Before Rates to Test Year After Rates.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO  
TO INTERROGATORIES OF ASSOCIATION OF PRIORITY MAIL USERS, INC.  
REDIRECTED FROM WITNESS ROBINSON  
(APMU/USPS-T34-29)**

**APMU/USPS-T34-29.** At Attachment J to your testimony, you provide forecasts of delivery confirmation transactions associated with Priority Mail for FY 2001. Witness Mayo proposes that signature confirmation "include delivery confirmation." How many of your forecasted delivery confirmation transactions for FY 2001 reflect signature confirmation transactions?

**RESPONSE:**

The Priority Mail Delivery Confirmation transactions projected for FY 2001 in witness Robinson's USPS-T-34, Attachment J, include 21,659,000 Signature Confirmation transactions. See USPS-T-39, WP-25 in Library Reference I-168.

**DECLARATION**

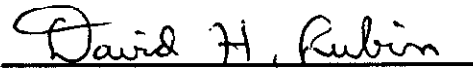
I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

Dated: March 16, 2000

## 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.



David H. Rubin

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March 16, 2000