

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF POSTAL SERVICE  
TO INTERROGATORIES UPS/USPS-T34-18-22, 26-27, 29(a)  
REDIRECTED FROM WITNESS ROBINSON

The United States Postal Service hereby provides responses to the following interrogatories of the United Parcel Service: UPS/USPS-T34-18-22, 26-27, 29(a), filed on March 17, 2000. These interrogatories have been redirected from Postal Service witness Robinson to the Postal Service.

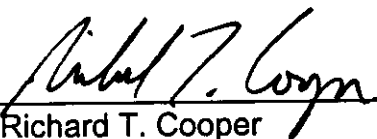
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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March 31, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-18.** Using ODIS data, provide separately the portion of FY1999 Priority Mail volume sent within:

- (a) a one-day service area that arrived:
  - (i) in one day;
  - (ii) in more than one day;
  
- (b) a two-day service area that arrived:
  - (i) in two days;
  - (ii) in less than two days;
  - (iii) in more than two days; and
  
- (c) a three-day service area that arrived:
  - (i) in three days;
  - (ii) in less than three days;
  - (iii) in more than three days.

**RESPONSE:**

(a)

- (i) 85 percent
- (ii) 15 percent.

(b)

- (i) 74 percent
- (ii) 11 percent.
- (iii) 26 percent.

(c)

- (i) 76 percent
- (ii) 45 percent
- (iii) 24 percent.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-19.** Using PETE data, provide separately the portion of FY1999 Priority Mail volume sent within:

- (a) a one-day service area that was actually delivered:
  - (i) in one day;
  - (ii) in more than one day;
  
- (b) a two-day service area that was actually delivered:
  - (i) in two days;
  - (ii) in less than two days;
  - (iii) in more than two days; and
  
- (c) a three-day service area that was actually delivered:
  - (i) in three days;
  - (ii) in less than three days;
  - (iii) in more than three days.

**RESPONSE:**

(a)

- (i) 90.4 percent.
- (ii) 9.6 percent.

(b)

- (i) 79.3 percent
- (ii) 16.5 percent
- (iii) 20.7 percent

(c) (i) - (iii) PETE does not measure service performance within the three day service standard area.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)**

**UPS/USPS-T34-20.** Using EXFC data, provide the portion of FY1999 First-Class Mail volume sent within:

- (a) a one-day service area that was actually delivered:
  - (i) in one day;
  - (ii) in more than one day;
  
- (b) a two-day service area that was actually delivered:
  - (i) in two days;
  - (ii) in less than two days;
  - (iii) in more than two days; and
  
- (c) a three-day service area that was actually delivered:
  - (i) in three days;
  - (ii) in less than three days;
  - (iii) in more than three days.

**RESPONSE:**

- (a)
  - (i) 93.3 percent
  - (ii) 6.7 percent.
  
- (b)
  - (i) 86.5 percent
  - (ii) 19.6 percent
  - (iii) 13.5 percent
  
- (c)
  - (i) 85.6 percent
  - (ii) 32.9 percent
  - (iii) 14.4 percent

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-21.** Provide separately the average length of haul for First-Class Mail within the following service areas:

- (a) one-day;
- (b) two-days;
- (c) three days

**RESPONSE:**

(a) - (c) Average length of haul for First-Class Mail by service area has not been computed.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-22.** Provide the average length of haul for Priority Mail within the following service areas:

- (a) one-day;
- (b) two-days;
- (c) three days.

**RESPONSE:**

(a) - (c) Average length of haul for Priority Mail by service area has not been computed.

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-26.** Describe and quantify all improvements in Priority Mail service performance since FY1996.

**RESPONSE:**

See attachment for ODIS data for FY 1996 and FY 1997.

See LR-USPS-I-170, Table 7 for ODIS data for FY 1998 and FY 1999.

See the table below for data from the Priority-End-To-End (PETE) service performance measurement system. Note: The PETE System was implemented in FY 1997 AP 5.

**Priority End-To-End (PETE)**

FY	PQ	% On Time Overnight Commitment	% On Time 2-Day Commitment
1997	2	85.99 %	70.75 %
	3	88.22 %	77.11 %
	4	85.99 %	71.69 %
1998	1	84.85 %	69.50 %
	2	82.73 %	60.77 %
	3	88.16 %	75.86 %
	4	91.26 %	82.88 %
1999	1	90.73 %	82.53 %
	2	88.15 %	67.21 %
	3	90.69 %	80.00 %
	4	91.37 %	84.62 %

ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 1, PFY 1996

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS	320,468	49.7	80.5	94.5	97.9	1.79
LETTERS	283,356	50.4	81.2	94.9	98.1	1.76
POSTCARDS	17,911	54.6	78.7	91.8	96.1	1.83
IPPS	1,698	34.0	67.8	88.8	95.5	2.19
FLATS	17,502	37.2	71.9	90.3	95.8	2.09
PRIORITY MAIL	2,955	30.1	82.5	94.1	97.6	1.98
ALL FOURTH CLASS	3,181	16.7	39.5	56.1	70.0	3.89
PARCEL POST	1,007	19.7	44.1	62.1	75.9	3.54
OTHER 4TH CL	2,174	14.2	35.8	51.1	65.2	4.17

EXCLUDES MAIL OF FOREIGN ORIGIN.

THIS DELIVERY INFORMATION DOES NOT REFLECT SERVICE STANDARD ACHIEVEMENT.



## ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 2, PFY 1996

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS	349,630	47.6	76.0	90.8	95.6	1.94
LETTERS	313,252	48.2	76.6	91.1	95.8	1.92
POSTCARDS	17,009	53.1	74.0	88.2	93.8	1.99
IPPS	1,786	31.0	62.1	84.2	92.2	2.40
FLATS	17,583	36.2	67.9	87.1	93.7	2.22
PRIORITY MAIL	3,360	24.3	70.7	87.9	94.2	2.30
ALL FOURTH CLASS	3,141	16.5	37.6	54.9	68.6	3.93
PARCEL POST	996	18.7	42.4	60.5	74.6	3.53
OTHER 4TH CL	2,145	14.2	33.0	49.3	62.7	4.33

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## ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 3, PFY 1996

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL  
DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND  
TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS -----	334,206 -----	49.1 -----	79.8 -----	94.4 -----	97.9 -----	1.80 -----
LETTERS	295,135	50.0	80.6	94.9	98.1	1.78
POSTCARDS	16,998	54.5	77.3	91.8	96.3	1.85
IPPS	1,579	32.3	66.9	88.7	95.3	2.22
FLATS	20,494	35.4	70.5	90.1	96.3	2.11
PRIORITY MAIL -----	3,502 -----	28.2 -----	81.3 -----	93.8 -----	97.5 -----	2.02 -----
ALL FOURTH CLASS -----	2,919 -----	17.0 -----	39.3 -----	56.5 -----	70.2 -----	3.82 -----
PARCEL POST	916	19.5	45.8	64.3	78.0	3.37
OTHER 4TH CL	2,003	15.2	34.8	50.9	64.7	4.14

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## ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 4, PFY 1996

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL  
DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND  
TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS -----	313,655 -----	49.7 ----	79.8 ----	94.2 ----	97.8 ----	1.80 ----
LETTERS	276,802	50.3	80.5	94.5	97.9	1.78
POSTCARDS	16,760	54.8	77.0	91.1	95.9	1.86
IPPS	1,596	31.8	64.7	88.2	95.4	2.26
FLATS	18,497	38.9	73.4	91.8	96.6	2.03
PRIORITY MAIL -----	3,233 -----	30.3 ----	83.6 ----	94.8 ----	97.7 ----	1.96 ----
ALL FOURTH CLASS -----	2,893 -----	17.7 ----	39.1 ----	54.9 ----	68.6 ----	3.88 ----
PARCEL POST	901	20.3	45.1	61.7	74.8	3.50
OTHER 4TH CL	1,992	15.8	34.6	49.7	64.0	4.16

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## ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 1, PFY 1997

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS -----	329,144 -----	47.7 ----	77.4 ----	93.2 ----	97.4 ----	1.87 ----
LETTERS	289,236	48.2	78.2	93.7	97.6	1.84
POSTCARDS	18,700	57.3	77.2	90.5	95.3	1.86
IPPS	1,752	30.5	61.7	86.1	94.6	2.34
FLATS	19,456	36.5	67.5	87.9	95.1	2.18
PRIORITY MAIL -----	3,503 -----	27.8 ----	80.0 ----	93.4 ----	97.3 ----	2.04 ----
ALL STANDARD A -----	3,389 -----	15.0 ----	33.0 ----	47.3 ----	60.9 ----	4.47 ----
STANDARD B	1,351	17.0	36.8	51.5	66.0	4.07
OTHER STND B	2,038	13.4	29.7	43.8	56.6	4.80

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ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 2, PFY 1997

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS -----	358,306 -----	46.7 ----	74.3 ----	89.9 ----	95.6 ----	1.98 ----
LETTERS	319,794	47.2	74.9	90.4	95.8	1.96
POSTCARDS	17,355	54.2	74.6	87.8	93.9	1.98
IPPS	1,754	32.6	60.5	82.7	91.7	2.42
FLATS	19,403	36.8	65.4	84.4	92.8	2.28
PRIORITY MAIL -----	3,904 -----	24.5 ----	68.8 ----	86.4 ----	93.7 ----	2.34 ----
ALL STANDARD A -----	3,638 -----	15.7 ----	34.9 ----	49.6 ----	63.5 ----	4.30 ----
STANDARD B	1,449	17.1	38.4	54.1	68.4	3.92
OTHER STND B	2,189	14.1	31.3	44.9	58.3	4.70

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ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 3, PFY 1997

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS	317,954	47.3	77.6	93.3	97.4	1.87
LETTERS	280,718	47.8	78.5	93.9	97.7	1.84
POSTCARDS	17,071	56.7	77.3	90.5	95.5	1.87
IPPS	1,731	30.8	64.2	86.9	94.5	2.30
FLATS	18,434	35.7	65.7	85.9	93.8	2.25
PRIORITY MAIL	3,644	27.5	79.1	93.0	97.1	2.07
ALL STANDARD A	3,158	16.3	36.7	52.4	65.6	4.19
STANDARD B	1,103	18.4	41.9	58.6	72.0	3.78
OTHER STND B	2,055	14.8	33.0	48.1	61.1	4.48

EXCLUDES MAIL OF FOREIGN ORIGIN.

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ODIS QUARTERLY STATISTICS REPORT

POSTAL QUARTER 4, PFY 1997

TABLE 4 - AVERAGE DAYS TO DELIVERY AND PERCENTAGE OF MAIL DELIVERED WITHIN SPECIFIED NUMBER OF DAYS BY CLASS AND TYPE OF MAIL

CLASS AND TYPE	ESTIMATED DAILY VOLUME (000)	PERCENTAGE DELIVERED WITHIN				AVERAGE DAYS TO DELIVERY
		1 DAY	2 DAYS	3 DAYS	4 DAYS	
ALL FIRST CLASS	314,074	47.7	78.0	93.4	97.3	1.86
-----	-----	-----	-----	-----	-----	-----
LETTERS	277,221	48.2	78.8	93.9	97.6	1.84
POSTCARDS	17,819	54.7	76.1	89.6	95.2	1.90
IPPS	1,690	32.7	63.6	85.5	93.3	2.35
FLATS	17,343	37.6	68.2	88.1	94.9	2.17
PRIORITY MAIL	3,799	27.2	75.7	90.7	95.5	2.16
-----	-----	-----	-----	-----	-----	-----
ALL STANDARD A	3,409	15.2	34.7	49.5	62.0	4.52
-----	-----	-----	-----	-----	-----	-----
STANDARD B	1,172	15.2	34.9	49.8	62.5	4.56
OTHER STND B	2,238	15.1	34.5	49.1	61.5	4.48

EXCLUDES MAIL OF FOREIGN ORIGIN.

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RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-27.** Describe and quantify all improvements in First-Class Mail service performance since FY1996.

**RESPONSE:**

See attachment to UPS/USPS-T34-26 for ODIS data for FY 1996 and FY 1997.

See LR-USPS-I-170, Table 7 for ODIS data for FY 1998 and FY 1999.

See USPS-T-9, Table 7 at 9 for EXFC data for FY 1994 to FY 1999.



RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(REDIRECTED FROM WITNESS ROBINSON)

**UPS/USPS-T34-29.** For each quarter in BY1998 and FY1999, provide copies of the Service Performance Quarterly Reports or the equivalent for Priority Mail based on:

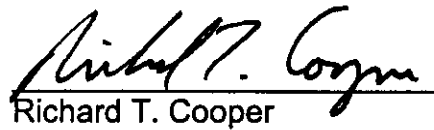
- (a) the ODIS service performance measurement system

**RESPONSE:**

- (a) See USPS-LR-I-170.

## 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.

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
March 31, 2000