

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 PLUNKET
TO INTERROGATORY OF THE ASSOCIATION OF PRIORITY MAIL USERS
(APMU/USPS-T36-1)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Association Of Priority Mail Users: APMU/USPS-T36-1, filed on March 23, 2000.

The 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



Scott L. Reiter

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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE ASSOCIATION OF PRIORITY MAIL USERS**

APMU/USPS-T36-1.

Please refer to page 5 (11. 13-15) of your testimony, where you state that implementation of the Eagle Network "enabled the Postal Service to provide much more reliable service for Express and Priority Mail between major markets..

- a. Please identify the comparison you had in mind when you stated that Priority Mail traveling on the Eagle Network received more reliable service. In other words, more reliable than what?
- b. Please supply performance data comparing Priority Mail that travels on the Eagle Network with Priority Mail that travels on commercial air.

APMU/USPS-T36-1 Response

- a. The citation in the interrogatory is from the section dealing with historical rate developments where I invoke a standard explanation (used most recently in Docket No. R97-1 (USPS-T-33, p. 10)) for observed volume trends. The comparison is between service performance prior to implementation of the Eagle network and after.
- b. The reference is to a specific period of time (1986-1990) that is long past. I am not aware of any studies available from that period of time. Over the last ten years, network and volume changes are likely to have rendered any such study – were it available – obsolete.

DECLARATION

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

Michael K. Plunkett

Dated: 4/6/00

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, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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