

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
DAVID B. POPKIN
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-126-128)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatories of David B. Popkin: DBP/USPS-126-128, filed on March 23, 2000. These interrogatories were redirected from 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


Richard T. Cooper

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

**RESPONSE OF UNITED STATES POSTAL SERVICE ROBINSON
TO INTERROGATORIES OF DAVID B. POPKIN
(REDIRECTED FROM THE POSTAL SERVICE)**

DBP/USPS-126. Please furnish a copy of USPS-LR-I-231 that was used to respond to my interrogatory DBP/USPS-4.

RESPONSE:

I understand that a copy of USPS-LR-I-231 has been mailed to Mr. Popkin.

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DBP/USPS-127. [a] Refer to your response to DBP/USPS-5-i-3. Are there any containers that are utilized for both Priority Mail and Express Mail?

RESPONSE:

- a. Yes. I am informed that item 1098 -- Tube 6" x 38" Express or Priority --may be used for either Express Mail or Priority Mails. This is indicated by the graphics on the tube.

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DBP/USPS-128 With respect to the processing of Priority Mail in the areas covered by a PMPC, answer and explain each of the following: [a] Does the Postal Service pay Emery a fee for each Priority Mail article that they process? [b] Is there a financial advantage to process a Priority Mail article outside of the Emery system? [c] Is there an operational advantage to process a Priority Mail article outside of the Emery system? [d] To what extent does the Postal Service trap Priority Mail articles, such as those destinating locally, in the same P&DC area, and/or in nearby P&DC areas so that the article will be transported outside of the Emery system?

RESPONSE:

[a] Yes.

[b] The term "financial advantage" is interpreted to mean "lower cost." I am informed that, on average, it is more expensive to process Priority Mail within the PMPC network.

[c] - [d] The term "operational advantage" is interpreted to mean one that improved the probability that Priority Mail will be delivered on time. I am informed that when Priority Mail arrives at a hand-off point too late to meet the Priority Mail Processing Center (PMPC) operating plan (such as late arrival at a commercial airport); or when volume surges beyond the capacity of the PMPC; the Postal Service will trap Priority Mail for processing at the local P&DC.

DECLARATION

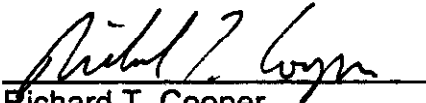
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Maura Robinson
MAURA ROBINSON

Dated: 4.7.2000

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.


Richard T. Cooper

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