

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
TO INTERROGATORIES OF DOUGLAS F. CARLSON
PURSUANT TO PRESIDING OFFICER'S RULING NO. R2000-1/43
(DFC/USPS-53)

The United States Postal Service hereby provides its response to the following interrogatory of Douglas F. Carlson: DFC/USPS-53, filed on March 7, 2000, pursuant to Presiding Officer's Ruling No. R2000-1/43.

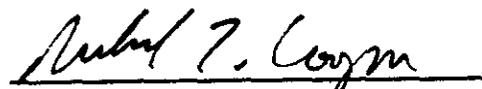
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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April 24, 2000

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

DFC/USPS-53. Please refer to the response to DFC/USPS-T34-13 and provide the ZIP Code pairs referenced in parts (1) and (2) of the response.

Per ruling R2000-1/43: "The Postal Service shall respond to DFC/USPS-53 by identifying the 3-digit ZIP-Code pairs where Priority Mail has an overnight service standard while First-Class Mail does not."

RESPONSE:

In the service standard database, Priority Mail has a one-day service standard while First-Class Mail has a slower service standard in 285 ZIP Code pairs. Since earlier responses were filed, the service standard database has been modified to correct errors. The information in the Attachment to DFC/USPS-53 reflects the service standard database as of April 21, 2000. In the process of responding to this request, previously unidentified errors have been identified in the database. These errors will be corrected in the database release at the beginning of PQ4, 2000.

Based on these corrections, of the 285 ZIP Code pairs in which Priority Mail has an overnight service standard while First-Class Mail does not, there are only 42 valid pairs where Priority Mail service standard is 1 day and First-Class Mail service standard is 2 days.

The remainder of the 285 ZIP Code pairs can be categorized as follows:

- 105 Invalid pairs where Priority Mail service standard is 1 day and First-Class Mail service standard is 2 days (Priority Mail service standard should be 2 days instead of 1 day.)

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138 Invalid pairs where Priority Mail service standard is 1 day and First-Class Mail service standard is 3 days. (Priority Mail service standard should be 2 days instead of 1 day).

The 285 ZIP Code Pairs, in their appropriate categories, are reproduced in the Attachment to DFC/USPS-53.

**42 VALID PAIRS WHERE PRIORITY MAIL SERVICE STANDARD IS 1-DAY
AND FIRST-CLASS MAIL SERVICE STANDARD IS 2-DAYS**

	ORIG ZIP	DEST ZIP	PRI	FCM
1	006	008	1	2
2	007	008	1	2
3	008	006	1	2
4	008	007	1	2
5	008	009	1	2
6	009	008	1	2
7	040	047	1	2
8	041	047	1	2
9	042	047	1	2
10	043	047	1	2
11	045	047	1	2
12	048	047	1	2
13	049	047	1	2
14	572	562	1	2
15	573	560	1	2
16	573	561	1	2
17	710	755	1	2
18	711	755	1	2
19	712	755	1	2
20	717	755	1	2

	ORIG ZIP	DEST ZIP	PRI	FCM
21	718	755	1	2
22	755	710	1	2
23	755	711	1	2
24	755	712	1	2
25	755	718	1	2
26	755	722	1	2
27	758	765	1	2
28	758	766	1	2
29	758	767	1	2
30	758	773	1	2
31	758	774	1	2
32	758	778	1	2
33	759	770	1	2
34	759	771	1	2
35	759	772	1	2
36	759	773	1	2
37	759	774	1	2
38	759	775	1	2
39	759	776	1	2
40	759	777	1	2
41	776	759	1	2
42	777	759	1	2

105 INVALID PAIRS WHERE PRIORITY MAIL SERVICE STANDARD IS 1-DAY AND FIRST-CLASS MAIL SERVICE STANDARD IS 2-DAYS (PRIORITY SHOULD BE 2-DAY INSTEAD OF 1-DAY)

	ORIG ZIP	DEST ZIP	PRI	FCM
1	200	090	1	2
2	200	091	1	2
3	200	092	1	2
4	200	094	1	2
5	200	096	1	2
6	200	097	1	2
7	200	098	1	2
8	201	090	1	2
9	201	091	1	2
10	201	092	1	2
11	201	094	1	2
12	201	096	1	2
13	201	097	1	2
14	201	098	1	2
15	202	090	1	2
16	202	091	1	2
17	202	092	1	2
18	202	094	1	2
19	202	096	1	2
20	202	097	1	2
21	202	098	1	2
22	203	090	1	2
23	203	091	1	2
24	203	092	1	2
25	203	094	1	2
26	203	096	1	2
27	203	097	1	2
28	203	098	1	2
29	204	090	1	2
30	204	091	1	2
31	204	092	1	2
32	204	094	1	2
33	204	096	1	2
34	204	097	1	2
35	204	098	1	2

	ORIG ZIP	DEST ZIP	PRI	FCM
36	205	090	1	2
37	205	091	1	2
38	205	092	1	2
39	205	094	1	2
40	205	096	1	2
41	205	097	1	2
42	205	098	1	2
43	208	090	1	2
44	208	091	1	2
45	208	092	1	2
46	208	094	1	2
47	208	096	1	2
48	208	097	1	2
49	208	098	1	2
50	209	090	1	2
51	209	091	1	2
52	209	092	1	2
53	209	094	1	2
54	209	096	1	2
55	209	097	1	2
56	209	098	1	2
57	220	090	1	2
58	220	091	1	2
59	220	092	1	2
60	220	094	1	2
61	220	096	1	2
62	220	097	1	2
63	220	098	1	2
64	221	090	1	2
65	221	091	1	2
66	221	092	1	2
67	221	094	1	2
68	221	096	1	2
69	221	097	1	2
70	221	098	1	2

	ORIG ZIP	DEST ZIP	PRI	FCM
71	222	090	1	2
72	222	091	1	2
73	222	092	1	2
74	222	094	1	2
75	222	096	1	2
76	222	097	1	2
77	222	098	1	2
78	223	090	1	2
79	223	091	1	2
80	223	092	1	2
81	223	094	1	2
82	223	096	1	2
83	223	097	1	2
84	223	098	1	2
85	226	090	1	2
86	226	091	1	2
87	226	092	1	2
88	226	094	1	2
89	226	096	1	2
90	226	097	1	2
91	226	098	1	2
92	227	090	1	2
93	227	091	1	2
94	227	092	1	2
95	227	094	1	2
96	227	096	1	2
97	227	097	1	2
98	227	098	1	2
99	254	090	1	2
100	254	091	1	2
101	254	092	1	2
102	254	094	1	2
103	254	096	1	2
104	254	097	1	2
105	254	098	1	2

138 INVALID PAIRS WHERE PRIORITY MAIL SERVICE STANDARD IS 1-DAY AND FIRST-CLASS MAIL SERVICE STANDARD IS 3-DAYS (PRIORITY SHOULD BE 2-DAY INSTEAD OF 1-DAY)

	ORIG ZIP	DEST ZIP	PRI	FCM
1	224	090	1	3
2	224	091	1	3
3	224	092	1	3
4	224	094	1	3
5	224	096	1	3
6	224	097	1	3
7	224	098	1	3
8	225	090	1	3
9	225	091	1	3
10	225	092	1	3
11	225	094	1	3
12	225	096	1	3
13	225	097	1	3
14	225	098	1	3
15	230	090	1	3
16	230	091	1	3
17	230	092	1	3
18	230	094	1	3
19	230	096	1	3
20	230	097	1	3
21	230	098	1	3
22	231	090	1	3
23	231	091	1	3
24	231	092	1	3
25	231	094	1	3
26	231	096	1	3
27	231	097	1	3
28	231	098	1	3
29	232	090	1	3
30	232	091	1	3
31	232	092	1	3
32	232	094	1	3
33	232	096	1	3
34	232	097	1	3
35	232	098	1	3

	ORIG ZIP	DEST ZIP	PRI	FCM
36	238	090	1	3
37	238	091	1	3
38	238	092	1	3
39	238	094	1	3
40	238	096	1	3
41	238	097	1	3
42	238	098	1	3
43	750	090	1	3
44	750	091	1	3
45	750	092	1	3
46	750	093	1	3
47	750	094	1	3
48	750	096	1	3
49	750	097	1	3
50	750	098	1	3
51	751	090	1	3
52	751	091	1	3
53	751	092	1	3
54	751	093	1	3
55	751	094	1	3
56	751	096	1	3
57	751	097	1	3
58	751	098	1	3
59	752	090	1	3
60	752	091	1	3
61	752	092	1	3
62	752	093	1	3
63	752	094	1	3
64	752	096	1	3
65	752	097	1	3
66	752	098	1	3
67	753	090	1	3
68	753	091	1	3
69	753	092	1	3
70	753	093	1	3

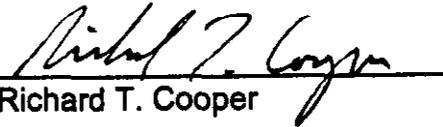
	ORIG ZIP	DEST ZIP	PRI	FCM
71	753	094	1	3
72	753	096	1	3
73	753	097	1	3
74	753	098	1	3
75	754	090	1	3
76	754	091	1	3
77	754	092	1	3
78	754	093	1	3
79	754	094	1	3
80	754	096	1	3
81	754	097	1	3
82	754	098	1	3
83	756	090	1	3
84	756	091	1	3
85	756	092	1	3
86	756	093	1	3
87	756	094	1	3
88	756	096	1	3
89	756	097	1	3
90	756	098	1	3
91	757	090	1	3
92	757	091	1	3
93	757	092	1	3
94	757	093	1	3
95	757	094	1	3
96	757	096	1	3
97	757	097	1	3
98	757	098	1	3
99	758	090	1	3
100	758	091	1	3
101	758	092	1	3
102	758	093	1	3
103	758	094	1	3
104	758	096	1	3
105	758	097	1	3

138 INVALID PAIRS WHERE PRIORITY MAIL SERVICE STANDARD IS 1-DAY AND FIRST-CLASS MAIL SERVICE STANDARD IS 3-DAYS (PRIORITY SHOULD BE 2-DAY INSTEAD OF 1-DAY)

	ORIG ZIP	DEST ZIP	PRI	FCM
106	758	098	1	3
107	760	090	1	3
108	760	091	1	3
109	760	092	1	3
110	760	093	1	3
111	760	094	1	3
112	760	096	1	3
113	760	097	1	3
114	760	098	1	3
115	761	090	1	3
116	761	091	1	3
117	761	092	1	3
118	761	093	1	3
119	761	094	1	3
120	761	096	1	3
121	761	097	1	3
122	761	098	1	3
123	762	090	1	3
124	762	091	1	3
125	762	092	1	3
126	762	093	1	3
127	762	094	1	3
128	762	096	1	3
129	762	097	1	3
130	762	098	1	3
131	764	090	1	3
132	764	091	1	3
133	764	092	1	3
134	764	093	1	3
135	764	094	1	3
136	764	096	1	3
137	764	097	1	3
138	764	098	1	3

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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April 24, 2000