

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 THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO UPS INTERROGATORIES
(UPS/USPS-T13-10-14)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of the United Parcel Service: UPS/USPS-T13-10-14, filed on March 22, 2000.

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 WITNESS RAYMOND TO
INTERROGATORIES OF UNITED PARCEL SERVICE (UPS/USPS-T13-10
THROUGH 14)**

UPS/USPS-T13-10. Provide a definition of "parcel," including size, cubic volume, and class of mail (if applicable), as used in the Engineered Standards Database. Provide supporting materials for your definition, such as training manuals or any other documentation.

RESPONSE:

The USPS Subject Matter Experts provided a verbal definition of a parcel. A parcel is a package that weighs two pounds or more, and/or is larger than a shoebox.

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THROUGH 14)**

UPS/USPS-T13-11. How does the carrier decide if a parcel is going to be a deviation parcel delivery?

RESPONSE:

I am unclear on exactly what you mean by a deviation parcel delivery. If you mean occasions when a carrier may change his normal delivery pattern to deliver a parcel out of sequence, then, based on my observations, this rarely occurs. I did not study the decision process behind such behavior.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO
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THROUGH 14)

UPS/USPS-T13-12. Describe any standards, criteria, or guidelines with respect to weight and/or cubic volume of a parcel(s) regarding when a carrier should make a deviation delivery. If these are written, provide a copy of them.

RESPONSE:

I did not study "deviation deliveries" for purposes of my study. To my knowledge, there are not any standards, criteria or guidelines with respect to weight and/or cubic volume of parcel(s) regarding when a carrier should make a "deviation delivery." The only deviation which we allowed for would be if the carrier were to deliver parcels or other items for another route. This would have been recorded as "Other Route" in the sampling data if it had occurred. The "Other Route" entry covered this and other activities. There are only 5 tallies containing "Other Route." None of these relate to parcels.

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THROUGH 14)**

UPS/USPS-T13-13. What are the guidelines in regard to size or shape for a deviation parcel delivery? If there are written guidelines, provide a copy of them.

RESPONSE:

I am not aware of any guidelines regarding size or shape for a deviation parcel delivery. See my response to UPS/USPS-T13-12.

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UPS/USPS-T13-14. In the initial survey design for the Engineered Standards project, were there discussions of "deviation" delivery runs for parcels? If so, provide any notes, memoranda, or other documentation that includes these discussions.

RESPONSE:

The possibility that a carrier might not follow his normal delivery sequence, for a number of reasons, was discussed in the initial design for the Engineered Standards project, but this was not specifically studied. See my response to UPS/USPS-T13-12. There isn't any documentation of these discussions.

DECLARATION

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

Lloyd B. Raymond
Date: A-24-00

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.


Richard T. Cooper

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