

DOCKET SECTION

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

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF POSTAL SERVICE WITNESS ROBINSON  
TO QUESTIONS POSED AT HEARING

The United States Postal Service hereby provides the responses of witness Robinson to questions posed at hearing. See Tr. 7/2857, 2858-9, 2915, 2894, and 2897.

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 26, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO QUESTIONS POSED DURING ORAL CROSS EXAMINATION**

**Tr. 7/2857:** Provide the extent of the overlap between the First-Class Mail ZIP Code pairs and the Priority Mail ZIP Code pairs subject to a one-day service standard.

**RESPONSE:**

I am informed that for all First-Class Mail ZIP Code pairs with a one-day service standard, Priority Mail has a one-day service standard. There are no ZIP Code pairs where Priority Mail has a slower service standard than First-Class Mail. For a listing of the ZIP Code pairs where Priority Mail has a one-day service standard while First-Class Mail has a service standard greater than one day, see the response to DFC/USPS-53.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO QUESTIONS POSED DURING ORAL CROSS EXAMINATION**

**Tr. 7/2858-9, 7/2915:** For FY 1999, provide the volume of Priority Mail and First-Class Mail that is within the one-day, two-day, and three-day service standard areas..

**RESPONSE:**

Below are the ODIS First-Class Mail and Priority Mail stamped and metered volumes by service standard.

**ORIGIN-DESTINATION INFORMATION SYSTEM  
FIRST-CLASS AND PRIORITY MAIL VOLUME  
BY SERVICE STANDARD, NATIONAL, FY 1999**

<b>Service Standard</b>	<b>First-Class Mail Volume</b>	<b>Priority Mail Volume</b>
One day	32,726,219,921	189,941,413
Two days	21,308,413,512	662,153,276
Three days	21,128,521,273	32,600,327
Total	75,163,154,706	884,695,016

Source: ODIS 635 Files.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO QUESTIONS POSED DURING ORAL CROSS EXAMINATION

**Tr. 7/2894:** Provide all display information for post offices concerning Priority Mail for FY 1999 and FY 2000.

**RESPONSE:**

Status Report (4/25/2000) We are working with the Retail program managers to identify and obtain copies of all material relating to Priority Mail displayed in post offices during FY 1999 and FY 2000. A number of responsive items have been identified and copies are being obtained. This information will be provided when it is available.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO QUESTIONS POSED DURING ORAL CROSS EXAMINATION**

**Tr. 7/2897:** Provide information on First-Class Mail and Priority Mail service standards as displayed on retail terminals. Can the retail terminal software be modified to include service standards associated with originating and destinating addresses?

**RESPONSE:**

**Availability of Service Commitment Information on Retail Terminals**

	Integrated Retail Terminals (IRTs)		POS ONE	
	MOS	Unisys	IBM	NCR
<b>Priority Mail</b>	Exception message for 3-day destinations	Exception message for 3-day destinations	2-days or less service commitment: Shows 2-day service commitment, or shows 3-day commitment	2-days or less service commitment: Shows 2-day service commitment, or shows 3-day commitment
<b>First-Class Mail</b>	No Information Displayed	No Information Displayed	Service commitment displayed is based on zones crossed: Local/Zone 1 = 1 day Zone 2 = 2 days Zones 3-8 = 3 days	Always shows 3 days
<b>Single-Screen Priority/FCM Comparison?</b>	Not available	Not available	Yes	Yes
<b>Can Service Commitment Display Be Modified?</b>	IRTs are 1980's technology and are being phased out. Lack of hard disks makes adding additional service commitment data impractical.		POS ONE does not currently have origin/destination-specific commitments for FCM and therefore cannot display accurate commitments. This feature is planned for a future modification to the POS ONE programming.	

**DECLARATION**

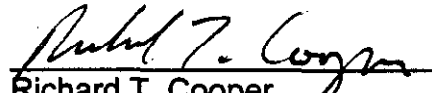
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
MAURA ROBINSON

Dated: 4.25.2000

**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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