

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

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POSTAL RATE COMMISSION
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Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES UPS/USPS-20 THROUGH 33

The United States Postal Service hereby provides its responses to the following interrogatories of the United Parcel Service: UPS/USPS-20 through 33, filed on April 20, 2000.

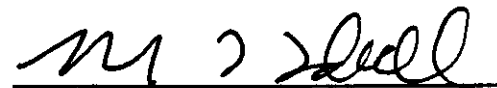
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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May 4, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-20. Using PETE data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

RESPONSE:

The PETE service performance measurement system does not test Priority Mail with a three-day service standard and only measures service performance for identified Priority Mail.

(a) - (e)

**PETE
Priority Mail Volumes
FY 1999**

Volume Delivered In:	Priority Mail Volume
One Day	153,036,424
Two Days	290,077,691
Three Days	66,221,213
Four Days	19,124,901
Five Days or More	10,483,661
Total	538,943,890

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-21. Using PETE data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

The PETE service performance measurement system does not test Priority Mail with a three-day service standard and only measures service performance for identified Priority Mail.

(a) - (c)

**PETE
Priority Mail Volumes
FY 1999**

Service Standard	Priority Mail Volume
One Day	86,609,090
Two Day	452,334,800
Total	538,943,890

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-22. Using ODIS data, provide the number of Priority Mail pieces for FY1999:

- (a) that arrived at the destination office within one day;
- (b) that arrived at the destination office within two days;
- (c) that arrived at the destination office within three days;
- (d) that arrived at the destination office within four days; and
- (e) that took more than four days to arrive at the destination office.

RESPONSE:

(a) - (e)

**Origin-Destination Information System
Priority Mail Volume
By Days To Delivery, National, FY 1999**

Days To Delivery	Priority Mail Volume Total
One Day	230,381,971
Two Days	439,653,734
Three Days	123,801,186
Four Days	40,757,642
Five Days or More	29,772,882
Total	864,367,415

Sources: ODIS 635 Files

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-23. Using ODIS data, provide the number of Priority Mail pieces for FY 1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

(a) - (c) See response of witness Robinson to question (Tr. 7/2858-9, 7/2915) posed during oral cross-examination. This response was filed on April 26, 2000.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-24. Using Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

RESPONSE:

The following response is for Priority Mail retail Delivery Confirmation volumes delivered between 3/15/1999 and 9/10/1999 only. It does not reflect the entire Priority Mail product.

(a) - (e)

**Delivery Confirmation Service Performance Data
Priority Mail With Retail Delivery Confirmation
FY 1999**

Volume Delivered In:	Priority Mail Volume
One Day	1,382,818
Two Days	5,748,127
Three Days	986,733
Four Days	484,075
Five Days or More	336,969
Total	8,938,722

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-25. Using Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

The following response is for Priority Mail retail Delivery Confirmation volumes delivered between 3/15/1999 and 9/10/1999 only. It does not reflect the entire Priority Mail product.

(a) - (c)

**Delivery Confirmation Service Performance Data
Priority Mail With Retail Delivery Confirmation
FY 1999**

Service Standard	Priority Mail Volume
One Day	674,106
Two Day	7,682,552
Three Day	582,064
Total	8,938,722

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-26. Using any available data other than ODIS, PETE, or Delivery Confirmation data, provide the number of Priority Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

RESPONSE:

(a) - (e) There are no data other than ODIS, PETE and Delivery Confirmation data.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-27. Using any available data other than ODIS, PETE, or Delivery Confirmation data, provide the number of Priority Mail pieces for FY 1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

(a) - (c) There are no data other than ODIS, PETE and Delivery Confirmation data.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-28 Using ODIS data, provide the number of First Class Mail pieces for FY 1999:

- (a) that arrived at the destination office within one day;
- (b) that arrived at the destination office within two days;
- (c) that arrived at the destination office within three days; and
- (d) that arrived at the destination office within four days;
- (e) that took more than four days to arrive at the destination office.

RESPONSE:

(a) - (e)

**Origin-Destination Information System
First-Class Mail Volume
By Days To Delivery, National, FY 1999**

Days To Delivery	First-Class Mail Volume Total
One Day	34,954,952,974
Two Days	22,380,217,629
Three Days	11,150,471,462
Four Days	2,594,862,189
Five Days or More	1,530,889,262
TOTAL	72,611,393,516

SOURCES: ODIS 635 FILES

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-29. Using ODIS data, provide the number of First Class Mail pieces for FY 1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

(a) - (c) See response of witness Robinson to question (Tr. 7/2858-9, 7/2915) posed during oral cross-examination. This response was filed on April 26, 2000.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-30. Using EXFC data, provide the number of First Class Mail pieces for FY 1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

RESPONSE:

(a) - (e)

**EXFC
First-Class Mail Volumes
FY 1999**

Volume Delivered In:	First-Class Mail Volume
One Day	36,669,012,167
Two Days	20,544,995,296
Three Days	12,793,898,593
Four Days	2,503,099,911
Five Days or More	1,549,400,998
Total	74,060,406,965

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-31. Using EXFC data, provide the number of First Class Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

(a) - (c)

**EXFC
First-Class Mail Volumes
FY 1999**

Service Standard	First-Class Mail Volume
One Day	34,040,381,509
Two Days	20,170,862,377
Three Days	19,849,163,079
Total	74,060,406,965

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-32. Using any available data other than ODIS or EXFC data, provide the number of First Class Mail pieces for FY1999:

- (a) that were delivered within one day;
- (b) that were delivered within two days;
- (c) that were delivered within three days;
- (d) that were delivered within four days; and
- (e) that took more than four days to be delivered.

RESPONSE:

(a) - (e) There are no data other than ODIS and EXFC data.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-33. Using any available data other than ODIS or EXFC data, provide the number of First Class Mail pieces for FY 1999:

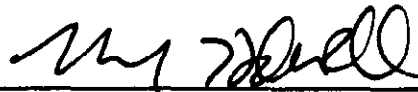
- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

RESPONSE:

(a) - (c) There are no data other than ODIS and EXFC data.

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.


Michael T. Tidwell

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May 4, 2000