

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 UNITED PARCEL SERVICE
(UPS/USPS-16,17)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-16-17, filed on April 18, 2000. The filing of these responses should render moot the UPS motion to compel filed on May 11, 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.
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May 22, 2000

Response of United States Postal Service to United Parcel Service
Interrogatory

UPS/USPS-16. For year-end FY1998 and FY1999, provide the number of routes for city carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side). If the exact information is not available, provide an estimate.

RESPONSE

See Table below. Data for city letter routes are from AMS, Address Management System. FY 98 totals based on report dated 09/13/1998; FY 99 totals based on report generated 11/01/1999. Rural routes data based on Rural routes Master Listing as of PP20, 2000. No census data for special purpose routes exist. Estimates derived from IOCS, in Office Cost System, (USPS LR I-12 for FY 98) based on sampling rates.

YEAR	Foot	Park & Loop	Curb	Dismount	Other	Total City Letter Route	Rural	Special Purpose Route
FY 98	15,424	87,767	38,679	22,623	1,438	165,931	62,338	9604*
FY 99	14,398	89,258	38,838	23,359	1,070	166,923	64,706	8120*
FY00						167,841*	67,100*	8801*
FY01						168,680*	69,582*	8842*

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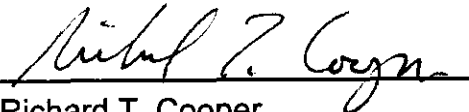
UPS/USPS-17. For year-end FY2000 and FY2001, provide an estimated projection of the number of routes for city carrier routes, Special Purpose Routes, and rural carrier routes, by route type (for example, foot, park & loop, and curb side).

RESPONSE

See table provided in UPS/USPS-16. Letter route estimates for 2000 and 2001 based on historical growth rate moderated by predicted reduction in rate of growth of mail volume. Rural estimates for 2000 and 2001 based only on historical growth rate. Special purpose route estimate for 2000 based on sampling rate for FY2000; estimate for 2001 averages the totals for 1998, 1999, and 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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