

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

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORY OF  
THE ASSOCIATION OF PRIORITY MAIL USERS, INC.  
(APMU/USPS-T10-2b., d., & e.)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of the Association of Priority Mail Users, Inc.: APMU/USPS-T10-2, subparts b., d., and e., as compelled by Presiding Officer's Ruling No. R2000-1/64, issued on May 18, 2000.

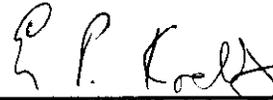
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
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(202) 268-2992 Fax -5402  
May 25, 2000

**COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
KINGSLEY TO INTERROGATORIES OF THE ASSOCIATION OF PRIORITY  
MAIL USERS, INC.**

**APMU/USPS-T10-2.** Please refer to your response to APMU/USPS-T10-1(d), where you state that "there has been measurable improvements in Priority service with the PMPCs compared to the rest of the network. . ."

- a. By "network," do you mean something other than the PMPC network, such as all Priority Mail processing and transportation outside the PMPC network?
- b. Please provide all evidence supporting your statement.
- c. Please provide the data demonstrating these measurable improvements for:
  - (i) Priority Mail both originating and destinating within the network service area;
  - (ii) Priority Mail originating within and destinating outside the network service area;
  - (iii) Priority Mail originating outside and destinating inside the network service area; and
  - (iv) Priority Mail neither originating nor destinating within the network service area.
- (d) Please reconcile your statement with the findings of the Postal Service Inspector General's office, as reported in the Inspector General's report, Priority Mail Processing Center Network (September 24, 1999) DA-AR-99-001.
- (e) Were the data which you cite provided to the Inspector General? Please explain your answer.

**Response:**

- (a) Motion to compel denied in POR-R2000-1/64.
- (b) My statement is supported by statements which appear in the Inspector General's Report which you have cited in subpart d. of your question. The contents of that report are restricted information, and I refer to it in this instance only because the Presiding Officer has compelled a response to this subpart over

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the Postal Service's objection. Specifically, the OIG report concluded that its comparison of PMPC network service with non-PMPC service showed marginal improvement of several percentage points in Priority Mail end-to-end delivery scores. Such a level of improvement was what I had in mind when making the statement you have quoted from my response to APMU/USPS-T10-1(d).

(c) Motion to compel denied in POR-R2000-1/64.

(d) - (e) Please see my response to subpart (b).

DECLARATION

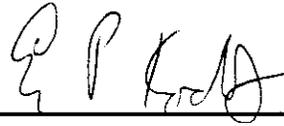
I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley

Date: 5-25-00

**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.

A handwritten signature in black ink, appearing to read "Eric P. Koetting", written over a horizontal line.

Eric P. Koetting

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