

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

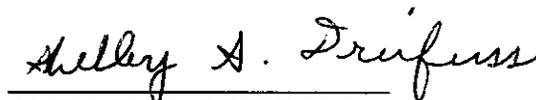
Complaint on First-Class Mail)
Service Standards)

Docket No. C2001-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-16-18)
October 9, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-15 dated September 17, 2001, are hereby incorporated by reference.

Respectfully submitted,



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Acting Director
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OCA/USPS-16. The following interrogatory refers to the USPS response to OCA/USPS-10.

- (a) Please explain why the on-time performance for First-Class Mail for 3-digit ZIP Code origin-destination pairs that were changed from 3-day to 2-day delivery has declined to 64 percent.
- (b) Please refer to part (a) of this interrogatory. What steps are being taken to improve the 64 percent on-time performance? If no steps are being taken to improve performance, please explain why none are planned.
- (c) For those ZIP Code pairs that were changed from 3-day to 2-day on-time performance, please provide the following: (1) the number and percentage of ZIP Code pairs that rely on surface transportation and, (2) the FY 2001 Q4 on-time surface transportation performance if different from the 64 percent.
- (d) For those ZIP Code pairs that were changed from 3-day to 2-day delivery, please provide the following: (1) the number and percentage of ZIP Code pairs that rely on air transportation and, (2) the FY 2001 Q4 on-time air transportation performance if different from the 64 percent.

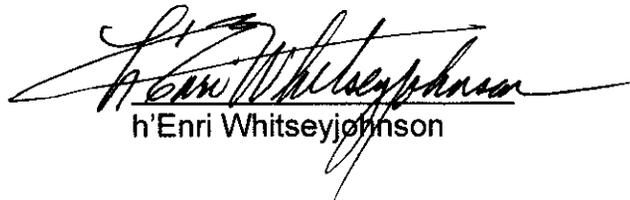
OCA/USPS-17. What is the on-time delivery record for the 3-digit ZIP Code pairs that were changed during FY 2000 and FY 2001 from two days to three days? What was the on-time delivery record for the same ZIP Code pairs for the two years immediately prior to the implementation of the Phase 2 service standards? Please include in your response the following information: (1) if the on-time delivery record improved, please explain the reasons for the improvement; (2) if the on-time delivery

record declined, please explain why the performance declined and what steps are being taken to improve performance; (3) the number and percentage of ZIP Code pairs that rely on air transportation and the air transportation performance; and, (4) the number and percentage of ZIP Code pairs that rely on surface transportation and the surface transportation performance.

OCA/USPS-18. Please refer to OCA/USPS-17. If the surface and air transportation on-time performance scores for FY 2001 Q4 differ, please explain why they differ.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



h'Enri Whitsey Johnson

Washington, D.C. 20268-0001
October 9, 2001