

UNITED STATES OF AMERICA  
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, 2001 )

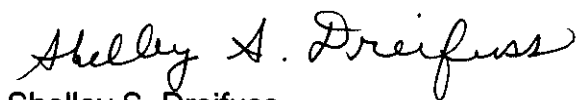
Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: JOSEPH D. MOELLER (OCA/USPS-T28-1-6)  
October 12, 2001

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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-1-21, dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T28-1. Please refer to your testimony at page 17, lines 5-6. You state that for First-Class Mail letters, the value of service is high in terms of both intrinsic and economic measures.

- (a) Please state the percentage of First-Class Mail that has traveled by air in each of the past 5 years.
- (b) Please indicate the corresponding expected percentages of First-Class Mail projected to travel by air in each of the next three years.
- (c) You state in your testimony at page 17, line 9, that First-Class Mail receives a high priority of delivery. Please provide information on the average length of time to deliver a First-Class piece of mail over each of the past 5 years.
- (d) Is this average length of time for mail delivery expected to increase or decrease in each of the next three years? Please provide data projecting for each year the expected delivery times.
- (e) You indicate at page 18, lines 3-4, that First-Class Mail users are not being disproportionately burdened by the proposed rate increase; please confirm that most of the First-Class Mail to which you are referring is covered by the Private Express Statutes.
- (f) Please refer to your testimony at page 2, line 18, through page 3, line 15. You identify the nine rate-making criteria to be considered in determining postal rate and fee levels. Please provide information on the relative weightings you employed for each of the criteria in evaluating the proposed rates for First-Class Mail.

- (g) Do you have any analyses and/or measurements of satisfaction of consumer expectations, as well as general satisfaction, with respect to First-Class Mail? If so, please provide this information and explain how you made use of it.

OCA/USPS-T28-2. Please refer to your testimony at page 22, lines 19-20. You indicate that Priority Mail "enjoys approximately the same priority of delivery as First-Class letters and makes use of air transportation."

- (a) Assuming that the delivery priorities are approximately the same, please state what additional value Priority Mail brings to the consumer over First-Class Mail.
- (b) Please state the percentage of Priority Mail using air transportation over the past five years.
- (c) Please state the percentage of Priority Mail projected to use air transportation over the next three years.
- (d) Please provide information on the average length of time to deliver a piece of Priority Mail over each of the past 5 years.
- (e) Please provide information on the average length of time to deliver a piece of Priority Mail over each of the next three years.
- (f) Please refer to your testimony at page 23, lines 8 through 18. You compare Priority Mail service to similar services provided by several competitors. Do you have any comparisons of the quality of service between Priority Mail and the services offered by competitors? If the answer is affirmative, please provide the information and explain how you made use of it.

- (g) Do you have any information on the average length of time for competitors to deliver items under similar services? If so, please provide it and explain how you made use of such information.
- (h) Do you have any information on the percentage of time that competitors deliver pieces on time as compared to the Postal Service? If so, please provide it and explain how you made use of the information.

OCA/USPS-T28-3. Do you have any analyses and/or measurements of consumer satisfaction of expectations, as well as general satisfaction, with respect to Priority Mail? If so, please provide this information and explain how you made use of it.

OCA/USPS-T28-4. Do you have any analyses and/or measurements of whether the Postal Service's performance in providing Priority Mail service fulfills the promises presented in Priority Mail advertising? If so, please provide this information and explain how you made use of it.

OCA/USPS-T28-5. Please refer to your testimony at page 26, lines 1-2. You state that, "The proposed rate level is appropriate in light of a balanced and proper consideration of all relevant criteria." You identify the nine rate-making criteria to be considered in determining postal rate and fee levels at page 2 of your testimony, line 18, through page 3, line 15. Please provide information on the relative weightings you employed for each of the criteria in evaluating the proposed rates for Priority Mail.

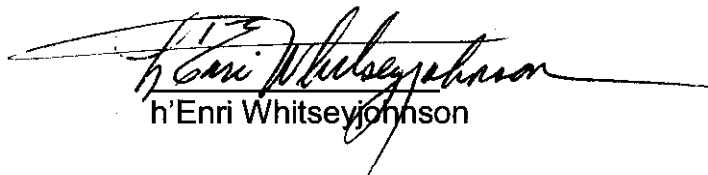
OCA/USPS-T28-6. Please refer to your testimony at page 27, line 2. You state that Express Mail receives the highest priority of delivery.

- (a) Please provide information on the average length of time that has been required to deliver a piece of Express Mail over each of the past 5 years.

- (b) Please provide information on the average length of time that is projected for delivery of Express Mail over each of the next three years.
- (c) Do you have any analyses and/or measurements of consumer satisfaction of expectations, as well as general satisfaction, with Express Mail? If so, please provide this information and explain how you made use of it.
- (d) You identified the nine rate-making criteria to be considered in determining postal rate and fee levels at page 2 of your testimony, line 18 through page 3, line 15. Please provide information on the relative weightings you employed for each of the criteria in evaluating the proposed rates for Express Mail.

#### 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 Rule 12 of the rules of practice.

  
h'Enri Whitsey Johnson

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October 12, 2001