

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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EXPERIMENTAL SUSPENSION OF FEE FOR
MANUAL DELIVERY CONFIRMATION CATEGORY

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R2001-2

Docket No. MC2001-2

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS O'HARA TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T1-35-36)

The United States Postal Service hereby provides the revised responses of witness O'Hara to the following interrogatories of United Parcel Service: UPS/USPS-T1-35-36, filed on October 17, 2001. The Postal Service filed responses to these interrogatories, among others, this morning in advance of witness O'Hara's appearance today. At his appearance, witness O'Hara adopted the revised responses provided herein.

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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October 23, 2001

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO INTERROGATORIES OF
UNITED PARCEL SERVICE**

UPS/USPS-T1-35. When the Postal Service describes the window-entered retail channel, does it include Contract Postal Units and private retail outlets such as Pak Mail or Postal Plus? If not, in what category are these outlets included?

RESPONSE: Yes with respect to Contract Postal Units. Private retail outlets would be included in the third-channel category.

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UPS/USPS-T1-36. Refer to your response to UPS/USPS-T1-28. Do the RPW-based volume figures regarding window-entered Priority Mail include private retail outlets and Contract Postal Units? If not, in what figures are these volumes included?

RESPONSE: Revenue from these Contract Postal Units is included in the total retail walk-in revenue that is used to scale up POS data, so volume from these sources is reflected in the window-entered Priority Mail data in my response to UPS/USPS-T1-28. Volume from private retail outlets is part of third-channel volume.

I would note that UPS/USPS-T1-28 asks only for window-entered Priority Mail, not for "RPW-based" window-entered Priority Mail. Because of the lack of information on metered Priority Mail entered by large commercial shippers (see my response to UPS/USPS-T1-34), I do not think it is possible to develop an RPW-based estimate of window-entered Priority Mail.

DECLARATION

I, Donald J. O'Hara, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Donald J. O'Hara", is written over a horizontal line.

Dated: October 23, 2001

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.



Frank R. Heselton

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