

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TOLLEY
TO UPS INTERROGATORIES UPS/USPS -T7-1 - 41
(October 24, 2001)

The United States Postal Service hereby provides the response of witness Tolley to the following interrogatories of United Parcel Service: UPS/USPS-T7-1 - 41, filed on October 10, 2001. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



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October 24, 2001

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-1. Provide for BY2000 (i) the volume of First Class letter mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in Postal Year 2000 (i) 21.1 percent of First-Class letter mail was sent by residential customers, and (ii) 74.8 percent was sent by businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-2. Provide for BY2000 (i) the volume of First Class letter mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in Postal Year 2000 (i) 45.1 percent of First-Class letter mail was sent to residential customers, and (ii) 51.8 percent was sent to businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-3. Provide for First Class letter mail the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 38.6 percent of First-Class letter mail was sent by businesses to residences in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-4. Provide for First Class letter mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 37.2 percent of First-Class letter mail was sent by businesses to businesses in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-5. Provide for First Class letter mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 14.6 percent of First-Class letter mail was sent by residential customers to businesses in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-6. Provide for First Class letter mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 6.5 percent of First-Class letter mail was sent by residential customers to residences in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-7. Provide for BY2000 (i) the volume of single piece First Class letter mail that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in Postal Year 2000 (i) 32.8 percent of single piece First-Class letter mail was sent by residential customers, and (ii) 64.2 percent was sent by businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-8. Provide for BY2000 (i) the volume of single piece First Class letter mail that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in Postal Year 2000 (i) 38.3 percent of single piece First-Class letter mail was sent to residential customers, and (ii) 58.7 percent was sent to businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-9. Provide for single piece First Class letter mail the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 36.6 percent of single piece First-Class letter mail was sent by businesses to businesses in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-10. Provide for single piece First Class letter mail the volume that was sent by businesses to residential customers in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 27.6 percent of single piece First-Class letter mail was sent by businesses to residential customers in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-11. Provide for single piece First Class letter mail the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 10.7 percent of single piece First-Class letter mail was sent by residential customers to residences in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-12. Provide for single piece First Class letter mail the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimates of such volumes.

RESPONSE:

The Postal Service estimate is that 22.1 percent of single piece First-Class letter mail was sent by residential customers to businesses in Postal Year 2000.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-13. Provide for BY2000 (i) the volume of First Class parcels that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-14. Provide for BY2000 (i) the volume of First Class parcels that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-15. Provide for First Class parcels the volume that was sent by businesses to residences in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-16. Provide for First Class parcels the volume that was sent by businesses to businesses in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-17. Provide for First Class parcels the volume that was sent by residential customers to businesses in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-18. Provide for First Class parcels the volume that was sent by residential customers to residences in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down First Class parcels in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-19. Provide for BY2000 (i) the volume of Parcel Post that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in Postal Year 1997 (i) approximately 10 percent of Parcel Post volume was sent by residential customers, and (ii) approximately 90 percent of Parcel Post volume was sent by businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-20. Provide for BY2000 (i) the volume of Parcel Post that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

According to Postal Service estimates, in recent years (i) approximately 54 percent of Parcel Post volume has been sent to residential customers, and (ii) approximately 46 percent of Parcel Post volume has been sent to businesses.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-21. Provide for Parcel Post the volume that was sent by businesses to residences in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

The Postal Service estimate is that approximately 46 percent of Parcel Post volume has been sent by businesses to residences in recent years.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-22. Provide for Parcel Post the volume that was sent by businesses to businesses in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

The Postal Service estimate is that approximately 43 percent of Parcel Post volume has been sent by businesses to businesses in recent years.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-23. Provide for Parcel Post the volume that was sent by residential customers to businesses in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

The Postal Service estimate is that approximately 3 percent of Parcel Post volume has been sent by residential customers to businesses in recent years.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-24. Provide for Parcel Post the volume that was sent by residential customers to residences in BY 2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

The Postal Service estimate is that approximately 8 percent of Parcel Post volume has been sent by residential customers to residences in recent years.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-25. Refer to page 135 of your testimony, USPS-T7, where you state that “much of the volume of [Parcel Post] consists of shipments of merchandise from businesses to households.” Provide for BY2000 the volume of Parcel Post that consisted of shipments of merchandise from businesses to households. If this information is not available, provide the Postal Service’s best estimate of such volumes.

RESPONSE:

I am unaware of specific estimates the Postal Service has of this breakdown.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-26. Provide for BY2000 (i) the volume of Nondestination Entry Parcel Post (*inter-BMC and intra-BMC*) that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-27. Provide for BY2000 (i) the volume of Nondestination Entry Parcel Post (inter-BMC and intra-BMC) that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-28. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-29. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-30. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-31. Provide for Nondestination Entry Parcel Post (inter-BMC and intra-BMC) the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-32. Provide for BY2000 (i) the volume of Destination Entry Parcel Post (DBMC, DSCF, DDU) that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-33. Provide for BY2000 (i) the volume of Destination Entry Parcel Post (DBMC, DSCF, DDU) that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-34. Provide for Destination Entry Parcel Post (DBMC, DSCF, DDU) the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-35. Provide for Destination Entry Parcel Post (DBMC, DSCF, DDU) the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Parcel Post in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-36. Provide for BY2000 (i) the volume of Bound Printed Matter that was sent by residential customers, and, separately, (ii) the volume that was sent by businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-37. Provide for BY2000 (i) the volume of Bound Printed Matter that was sent to residential customers, and, separately, (ii) the volume that was sent to businesses. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-38. Provide for Bound Printed Matter the volume that was sent by businesses to residences in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-39. Provide for Bound Printed Matter the volume that was sent by businesses to businesses in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-40. Provide for Bound Printed Matter the volume that was sent by residential customers to businesses in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO UPS INTERROGATORIES

UPS/USPS-T7-41. Provide for Bound Printed Matter the volume that was sent by residential customers to residences in BY2000. If this information is not available, provide the Postal Service's best estimate of such volumes.

RESPONSE:

I am unaware of any information the Postal Service has which breaks down Bound Printer Matter mail in this way.

DECLARATION

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

George S. Tolley
(Signed)

October 18, 2001
(Date)

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.



Eric P. Koetting

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October 24, 2001