

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

EXPERIMENTAL SUSPENSION OF FEE FOR  
MANUAL DELIVERY CONFIRMATION CATEGORY

Docket Nos. R2001-2  
MC2001-2

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO UNITED PARCEL SERVICE INTERROGATORIES  
(UPS/USPS-T1-43, 44, 53 AND 54)

The United States Postal Service hereby files the responses of witness O'Hara to the following October 19, 2001, interrogatories of United Parcel Service: UPS/USPS-T1-43, 44, 53 and 54.

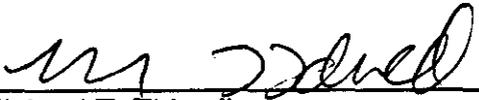
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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October 25, 2001

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

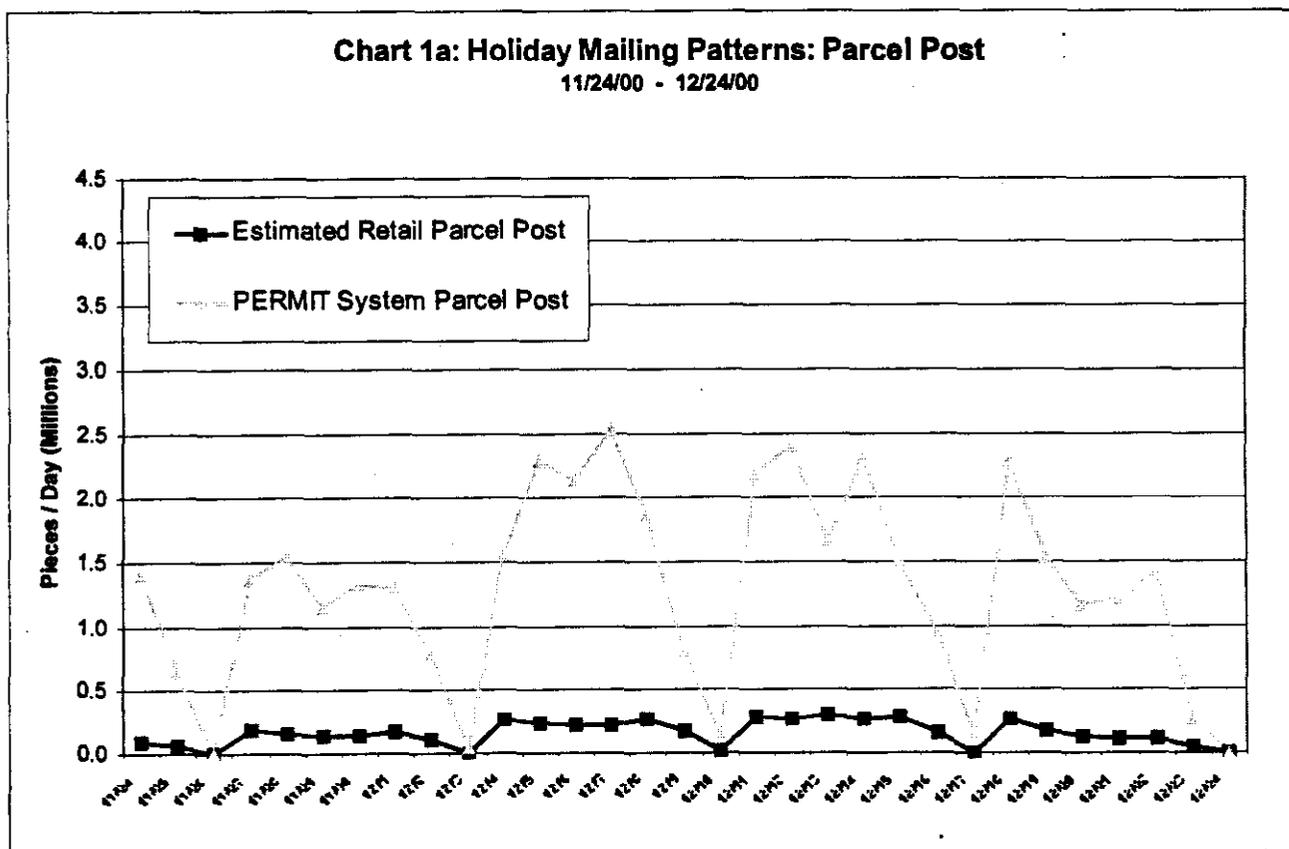
**UPS/USPS-T1-43.** Refer to Library Reference USPS-LR-1, DC-LR.xls, tabs "Chart 1," "Chart 2," and "Chart 3," which contain Priority Mail volume information.

(a) Provide, in the same format, volume information for Parcel Post similar to that provided in "Chart 1."

(b) Provide, in the same format, volume information for Parcel Post similar to that provided in "Chart 2."

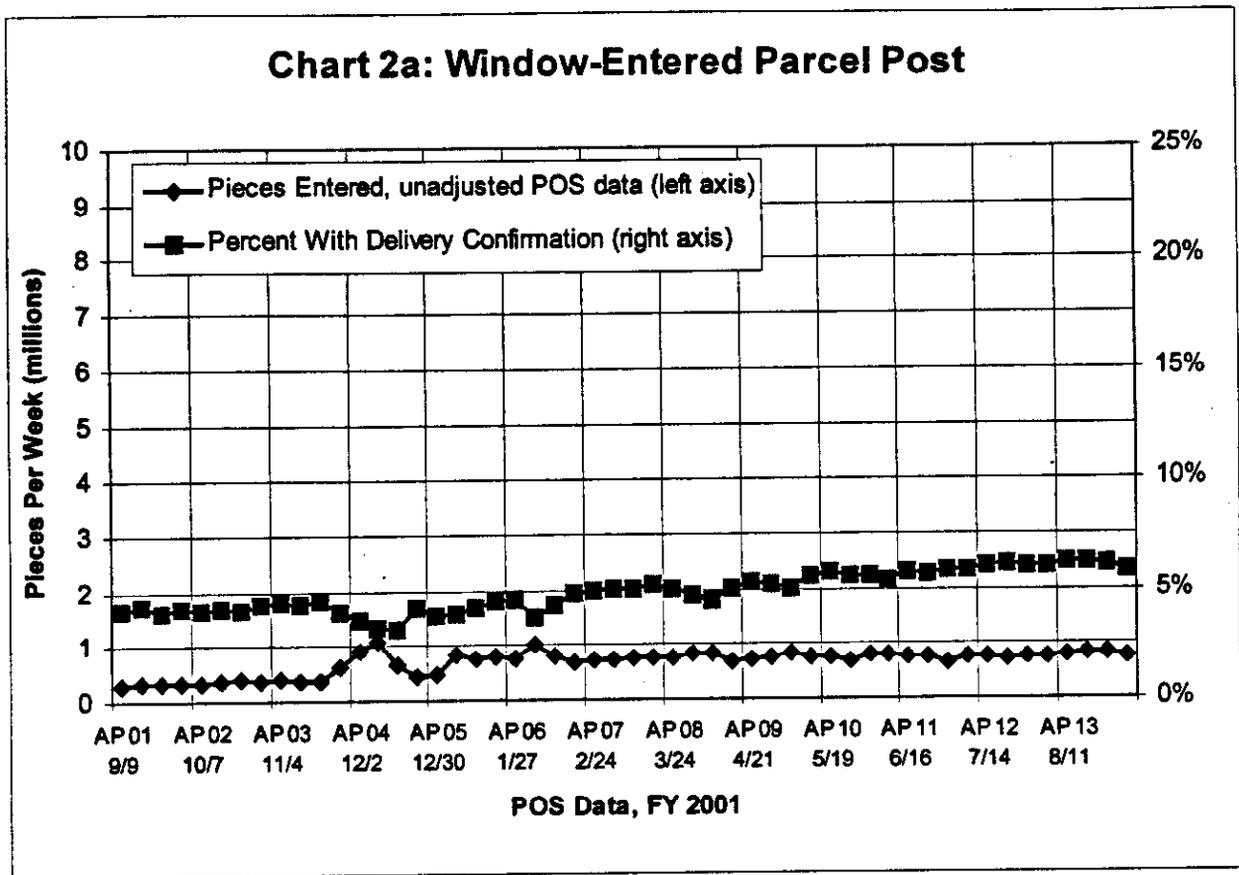
(c) Provide, in the same format, volume information for Parcel Post similar to that provided in "Chart 3."

**RESPONSE:** Note that the data used to construct these charts are included in my response to UPS/USPS-T1-44.



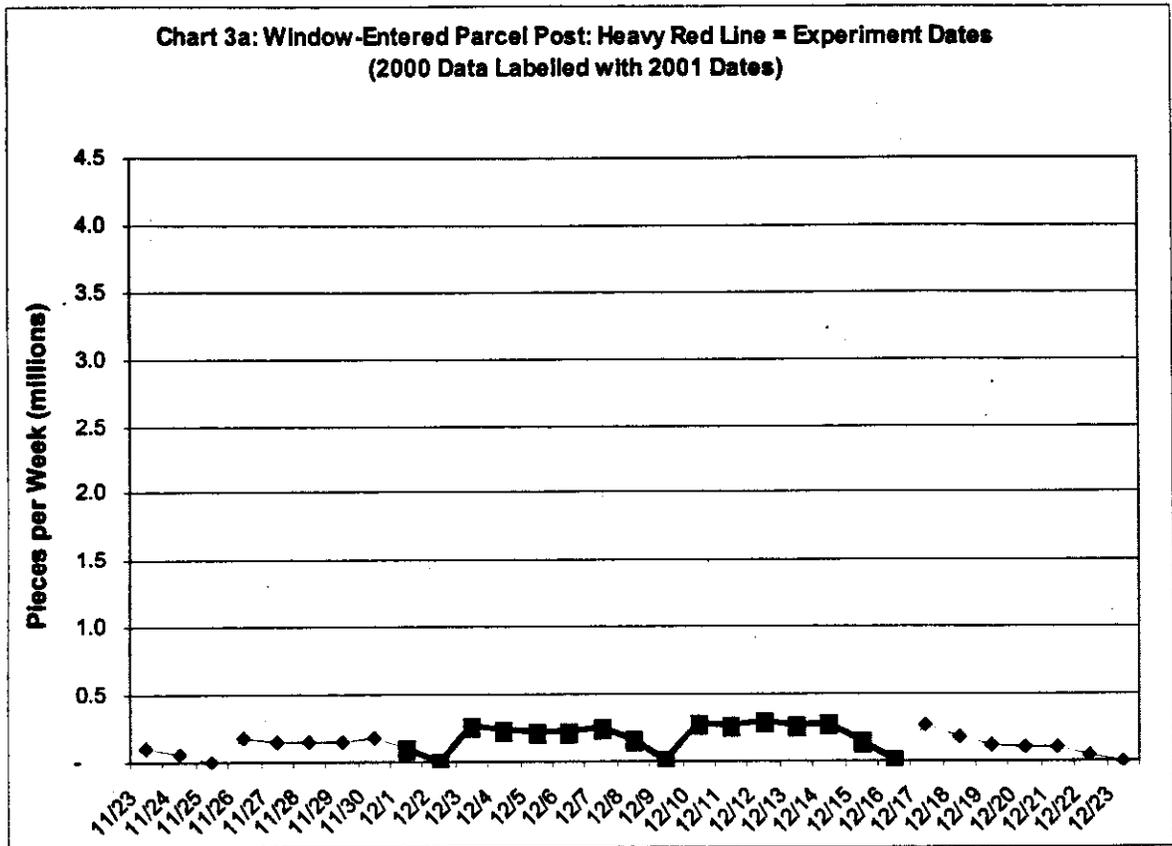
RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO INTERROGATORIES OF  
UNITED PARCEL SERVICE

RESPONSE TO UPS/USPS-T1-43, Continued



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

RESPONSE TO UPS/USPS-T1-43, Continued



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

**UPS/USPS-T1-44.** Refer to Library Reference USPS-LR-1, DC-LR.xls, tabs "WP-p.3 Daily Data" and "WP-p.4 Weekly Data," which contain Priority Mail volume information.

(a) Provide, in the same format, volume information for Parcel Post similar to that provided in "WP-p.3 Daily Data."

(b) Provide, in the same format, volume information for Parcel Post similar to that provided in "WP-p.4 Weekly Data."

**RESPONSE: (a)**

<b>Daily Parcel Post Volume Data: Retail Window-Entered &amp; PERMIT System</b>							
<b>CY 2000 Dates</b>	<b>Parcel Post Volume Entered at POS Sites</b>	<b>Est. Retail Parcel Post Vol: POS*100/70 (Millions)</b>	<b>PERMIT System Parcel Post Vol. (Millions)</b>	<b>Exp. Retail Vol,</b>	<b>Non-Exp. Retail Vol,</b>	<b>2001 Dates</b>	
11/24/00	70,387	0.100553	1.415905		0.1	11/23	
11/25/00	43,794	0.062563	0.629768		0.1	11/24	
11/26/00	1,612	0.002303	0.006365		0.0	11/25	
11/27/00	127,594	0.182277	1.386781		0.2	11/26	
11/28/00	107,455	0.153507	1.551424		0.2	11/27	
11/29/00	98,968	0.141383	1.144271		0.1	11/28	
11/30/00	98,880	0.141257	1.331431		0.1	11/29	
12/01/00	119,470	0.170671	1.297409		0.2	11/30	
12/02/00	73,350	0.104786	0.775946	0.1	0.1	12/1	
12/03/00	2,368	0.003383	0.049024	0.0		12/2	
12/04/00	188,694	0.269563	1.565479	0.3		12/3	
12/05/00	162,294	0.231849	2.304063	0.2		12/4	
12/06/00	152,097	0.217281	2.143264	0.2		12/5	
12/07/00	156,010	0.222871	2.531552	0.2		12/6	
12/08/00	179,938	0.257054	1.857865	0.3		12/7	
12/09/00	116,917	0.167024	0.791615	0.2		12/8	
12/10/00	7,173	0.010247	0.145197	0.0		12/9	
12/11/00	196,837	0.281196	2.193828	0.3		12/10	
12/12/00	187,961	0.268516	2.408616	0.3		12/11	
12/13/00	204,539	0.292199	1.659956	0.3		12/12	
12/14/00	185,853	0.265504	2.319065	0.3		12/13	
12/15/00	199,096	0.284423	1.524909	0.3		12/14	
12/16/00	103,595	0.147993	0.925569	0.1		12/15	
12/17/00	5,322	0.007603	0.149389	0.0	0.0	12/16	
12/18/00	182,627	0.260896	2.280741		0.3	12/17	
12/19/00	122,321	0.174744	1.542267		0.2	12/18	
12/20/00	86,399	0.123427	1.156898		0.1	12/19	
12/21/00	73,849	0.105499	1.206512		0.1	12/20	
12/22/00	72,832	0.104046	1.417771		0.1	12/21	
12/23/00	35,392	0.050560	0.259650		0.1	12/22	
12/24/00	541	0.000773	0.006009		0.0	12/23	

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

RESPONSE TO UPS/USPS-T1-44(a) Continued:

Above Data summed in response to UPS/USPS-T1-49(b)							
11/25/00 thru 12/1/00		0.853961					
12/2/00 thru 12/22/00		3.800103					
12/2/00 thru 12/8/00		1.306787					
12/9/00 thru 12/15/00		1.569109					
12/16/00 thru 12/22/00		0.924207					

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

**RESPONSE TO UPS/USPS-T1-44(b):**

<b>FY 2001 Weekly POS Data on Priority Mail and Manual Delivery Confirmation</b>					
<b>A/P Begins</b>	<b>FY 2001</b>	<b>POS Parcel Post Volume (millions)</b>	<b>POS Manual DC Purchased with Parcel Post (millions)</b>	<b>% POS Parcel Post with Delivery Confirmation</b>	<b>Est. Retail Parcel Post Vol: POS*100/70 (Millions)</b>
9/9	AP 01	0.304226	0.012647	4.2%	0.4
		0.311609	0.013365	4.3%	0.4
		0.326506	0.013211	4.0%	0.5
		0.342387	0.014399	4.2%	0.5
10/7	AP 02	0.332994	0.013935	4.2%	0.5
		0.373540	0.015826	4.2%	0.5
		0.388041	0.016005	4.1%	0.6
		0.374495	0.016437	4.4%	0.5
11/4	AP 03	0.386707	0.017448	4.5%	0.6
		0.369371	0.016202	4.4%	0.5
		0.375054	0.017385	4.6%	0.5
		0.597773	0.024320	4.1%	0.9
12/2	AP 04	0.914751	0.033578	3.7%	1.3
		1.098376	0.036696	3.3%	1.6
		0.646945	0.020919	3.2%	0.9
		0.425355	0.018199	4.3%	0.6
12/30	AP 05	0.480479	0.018850	3.9%	0.7
		0.839672	0.033622	4.0%	1.2
		0.765183	0.032538	4.3%	1.1
		0.805042	0.036655	4.6%	1.2
1/27	AP 06	0.774955	0.035916	4.6%	1.1
		1.016621	0.038221	3.8%	1.5
		0.806951	0.035128	4.4%	1.2
		0.683582	0.033458	4.9%	1.0
2/24	AP 07	0.725263	0.036064	5.0%	1.0
		0.733094	0.036768	5.0%	1.0
		0.741225	0.037242	5.0%	1.1
		0.744334	0.038739	5.2%	1.1
3/24	AP 08	0.767677	0.039123	5.1%	1.1
		0.844656	0.040519	4.8%	1.2
		0.831389	0.037665	4.5%	1.2
		0.672906	0.034204	5.1%	1.0
4/21	AP 09	0.725144	0.038702	5.3%	1.0
		0.748190	0.039407	5.3%	1.1
		0.830678	0.041846	5.0%	1.2
		0.749424	0.041924	5.6%	1.1
5/19	AP 10	0.755490	0.043302	5.7%	1.1
		0.679895	0.038268	5.6%	1.0
		0.800585	0.044784	5.6%	1.1
		0.791845	0.043061	5.4%	1.1
6/16	AP 11	0.746244	0.042898	5.7%	1.1
		0.753489	0.043001	5.7%	1.1
		0.667803	0.038936	5.8%	1.0
		0.757059	0.044475	5.9%	1.1

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

RESPONSE TO UPS/USPS-T1-44(b) Continued:

7/14	AP 12	0.746658	0.044877	6.0%	1.1
		0.737613	0.045299	6.1%	1.1
		0.770653	0.046281	6.0%	1.1
		0.770933	0.046618	6.0%	1.1
8/11	AP 13	0.796619	0.049686	6.2%	1.1
		0.815973	0.051071	6.3%	1.2
		0.826504	0.050716	6.1%	1.2
		0.752105	0.044310	5.9%	1.1

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

**UPS/USPS-T1-53.** Provide the volume of window-entered Priority Mail pieces during the following periods:

- (i) November 27, 1999 through December 3, 1999;
- (ii) December 4, 1999 through December 10, 1999;
- (iii) December 4, 1999 through December 24, 1999;
- (iv) December 11, 1999 through December 17, 1999; and
- (v) December 18, 1999 through December 24, 1999.

**RESPONSE:**

I am informed that POS data for FY 2000 are much less complete than for FY 2001. The reason is that, until software changes were at the beginning of FY 2001, window clerks would often print PVI labels without specifying the class of mail and/or special service to which the label was applied. This caveat should be kept in mind in any use of POS based data for FY 2000, such as that requested in UPS/USPS-T1-53-56.

<b>Daily Priority Volume Data: Retail Window-Entered and PERMIT System</b>								
CY 1999 Dates	Priority Volume Entered at POS Sites	Delivery Confirmation with Priority at POS Sites	Est. Window- Entered Priority Vol.: POS*100/70 (Millions)	Est. DC with Window -Entered Priority	PERMIT Priority Volume (Millions)	Exp. Retail Vol.	Non- Exp. Retail Vol.	2001 Dates
11/26/99	257,015	33,004	0.367	0.047	1.1		0.4	11/25
11/27/99	166,980	21,139	0.239	0.030	0.5		0.2	11/26
11/28/99	2,284	267	0.003	0.000	0.1		0.0	11/27
11/29/99	477,663	54,317	0.682	0.078	2.0		0.7	11/28
11/30/99	418,750	48,787	0.598	0.070	1.4		0.6	11/29
12/01/99	388,909	44,433	0.556	0.063	2.6		0.6	11/30
12/02/99	371,481	41,033	0.531	0.059	2.1		0.5	12/1
12/03/99	419,174	47,141	0.599	0.067	2.0		0.6	12/2
12/04/99	257,234	28,077	0.367	0.040	0.6	0.4	0.4	12/3
12/05/99	4,999	551	0.007	0.001	0.3	0.0		12/4
12/06/99	691,585	63,645	0.988	0.091	1.5	1.0		12/5
12/07/99	614,796	60,113	0.878	0.086	1.7	0.9		12/6
12/08/99	561,880	53,581	0.803	0.077	1.8	0.8		12/7
12/09/99	552,498	51,539	0.789	0.074	1.8	0.8		12/8
12/10/99	644,067	59,342	0.920	0.085	1.8	0.9		12/9
12/11/99	444,635	40,427	0.635	0.058	1.2	0.6		12/10
12/12/99	38,214	4,014	0.055	0.006	0.2	0.1		12/11
12/13/99	1,099,999	86,319	1.571	0.123	1.8	1.6		12/12
12/14/99	999,332	80,557	1.428	0.115	2.3	1.4		12/13
12/15/99	951,780	75,619	1.360	0.108	2.0	1.4		12/14
12/16/99	911,368	73,428	1.302	0.105	2.3	1.3		12/15
12/17/99	985,029	80,701	1.407	0.115	2.2	1.4		12/16

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

**RESPONSE TO UPS/USPS-T1-53 Continued:**

12/18/99	735,470	59,104	1.051	0.084	1.2	1.1		12/17
12/19/99	90,822	7,508	0.130	0.011	0.3	0.1	0.1	12/18
12/20/99	1,252,713	100,407	1.790	0.143	1.9		1.8	12/19
12/21/99	803,492	72,668	1.148	0.104	2.1		1.1	12/20
12/22/99	476,940	46,807	0.681	0.067	1.3		0.7	12/21
12/23/99	330,615	34,842	0.472	0.050	1.0		0.5	12/22
12/24/99	198,497	22,577	0.284	0.032	0.4		0.3	12/23
12/25/99	73	7	0.000	0.000	0.0		0.0	12/24
12/26/99	972	163	0.001	0.000	0.0		0.0	12/25
11/27/99 thru 12/3/99			3.207	0.367				
12/4/99 thru 12/10/99			4.753	0.453				
12/4/99 thru 12/24/99			18.066	1.574				
12/11/99 thru 12/17/99			7.758	0.630				
12/18/99 thru 12/24/99			5.555	0.491				

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

**UPS/USPS-T1-54.** Provide the volume of window-entered Priority Mail pieces for which Delivery Confirmation was purchased during the following periods:

- (i) November 27, 1999 through December 3, 1999;
- (ii) December 4, 1999 through December 10, 1999;
- (iii) December 4, 1999 through December 24, 1999;
- (iv) December 11, 1999 through December 17, 1999; and
- (v) December 18, 1999 through December 24, 1999.

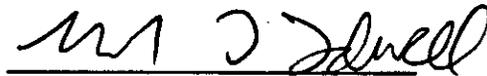
**RESPONSE:**

I am informed that POS data for FY 2000 are much less complete than for FY 2001. The reason is that, until software changes were at the beginning of FY 2001, window clerks would often print PVI labels without specifying the class of mail and/or special service to which the label was applied. This caveat should be kept in mind in any use of POS based data for FY 2000, such as that requested in UPS/USPS-T1-53-56.

The data requested are contained in my response to UPS/USPS-T1-53.

## CERTIFICATE OF SERVICE

I hereby certify that I have attached a copy of the foregoing has been served on all parties of record in accordance with the Commission's Rules of Practice and Procedure.



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