

RECEIVED

Oct 26 4 32 PM '01

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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS MOELLER
(OCA/USPS-T28-1(a)-(b) and 2(b)-(c))

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T28-1(a)-(b) and 2(b)-(c), filed on October 12, 2001, and redirected from witness Moeller (USPS-T-28).

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:



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 26, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
Redirected from witness Moeller (USPS-T-28)**

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.

RESPONSE:

(a) These data are not available. Accurate information regarding the total amount of First-Class Mail or any other class or subclass of mail that travels by all modes of transportation is not tracked by Postal Service information systems. The transportation cost system (TRACS) estimates the distribution of costs by mail class and subclass on various modes of transportation; however, it does not track the total, or even relative, amount of volume within modes and across modes.

(b) Please see response to OCA/USPS-T28-1(a). Because historic and current data are not available regarding the amount of First-Class Mail or any other class or subclass of mail that travels by air, the Postal Service cannot accurately project future volumes that will travel by air.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
Redirected from witness Moeller (USPS-T-28)**

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."

(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.

RESPONSE:

(b) Please see response to OCA/USPS-T28-1(a).

(c) Please see response to OCA/USPS-T28-1(b).

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 26, 2001