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

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL SUSPENSION OF FEE FOR
MANUAL DELIVERY CONFIRMATION CATEGORY

Docket Nos. R2001-2
MC2001-2

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS O'HARA
TO UNITED PARCEL SERVICE INTERROGATORIES
(UPS/USPS-T1-46, 55 AND 56)**

The United States Postal Service hereby files the responses of witness O'Hara to the following interrogatories of United Parcel Service, filed on October 19, 2001:

UPS/USPS-T1-46, 55 and 56.

The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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October 26, 2001

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

UPS/USPS-T1-46. Refer to page 5 of your testimony, where you discuss the potential for "modest savings in clerk and carrier overtime." Provide the total overtime cost separately for (a) window clerks, (b) clerks, and (c) city delivery carriers for each of the following weeks:

- (i) November 25, 2000 through December 1, 2000;
- (ii) December 2, 2000 through December 8, 2000;
- (iii) December 9, 2000 through December 15, 2000; and
- (iv) December 16, 2000 through December 22, 2000.

RESPONSE:

Estimated Overtime Costs FY2001, Week 4 Ap 03 - Week 3 AP 04)

Week	MP Clerk Overtime Hours****	Estimated Cost
12	716,672	\$19,377,736
13	1,006,773	\$27,221,632
14	1,450,420	\$39,217,181
15	1,732,886	\$46,854,638

Week	City Carrier Overtime Hours*	Estimated Cost
12	1,283,891	\$36,292,004
13	1,225,490	\$34,641,171
14	1,301,881	\$36,800,531
15	1,389,715	\$39,283,352

Week	Window Services Overtime Hours**	Estimated Cost
12	122,654	\$3,450,355
13	158,724	\$4,465,033
14	218,124	\$6,136,003
15	238,919	\$6,720,983

Week	Other Clerk Hours***	Estimated Cost
12	372,899	\$10,082,630
13	416,448	\$11,260,129
14	494,077	\$13,359,101
15	553,960	\$14,978,247

* Includes LDC's 21,22,23,27,28, and 29

** LDC 45 only

*** LDC's 41,42,43,44,47, and 48

**** All Mail Processing LDC's except LDC 10 (Supervisors)

Sources: Overtime Hours - NWRSF File
Dollar Rate - National Payroll Hours Summary

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

PS/USPS-T1-55. Provide the volume of window-entered Priority Mail pieces by week for FY2000.

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 made 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.

FY 2000 Weekly POS Data on Priority Mail and Manual Delivery Confirmation

A/P Begin s	FY 2000 POS Priority Mail Volume	Priority DC Purchased with Priority Mail	% POS Priority Mail with Delivery Confirmation	Est. Window- Entered Priority Vol: POS*100/70 (Millions)	Est. Window- Entered Priority with DC: POS*100/70 (Millions)	
9/11/99	AP 01	1,167,382	12,288	1.1%	1.667689	0.017554
		1,230,374	0	0.0%	1.757677	0.000000
		1,207,630	25	0.0%	1.725186	0.000036
		1,401,994	56	0.0%	2.002849	0.000080
10/9	AP 02	1,316,279	154	0.0%	1.880399	0.000220
		1,461,102	117,190	8.0%	2.087289	0.167414
		1,787,532	198,291	11.1%	2.553617	0.283273
		1,695,989	204,636	12.1%	2.422841	0.292337
11/6	AP 03	1,608,565	198,912	12.4%	2.297950	0.284160
		1,849,904	226,351	12.2%	2.642720	0.323359
		1,498,116	188,704	12.6%	2.140166	0.269577
		2,245,241	257,117	11.5%	3.207487	0.367310
12/4	AP 04	3,327,049	316,814	9.5%	4.752927	0.452591
		5,430,357	441,065	8.1%	7.757653	0.630093
		3,888,549	343,913	8.8%	5.555070	0.491304
		1,688,595	207,402	12.3%	2.412279	0.296289
1/1	AP 05	1,765,040	220,102	12.5%	2.521486	0.314431
		1,861,175	250,947	13.5%	2.658821	0.358496
		1,664,770	220,612	13.3%	2.378243	0.315160
		1,832,892	255,291	13.9%	2.618417	0.364701
1/29	AP 06	1,919,254	239,535	12.5%	2.741791	0.342193
		1,635,792	194,473	11.9%	2.336846	0.277819
		1,862,199	270,811	14.5%	2.660284	0.386873
		1,710,951	258,801	15.1%	2.444216	0.369716

**RESPONSE OF POSTAL SERVICE WITNESS O'HARA TO INTERROGATORIES OF
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RESPONSE TO UPS/USPS-T1-55 CONTINUED:

2/26	AP 07	1,926,295	296,755	15.4%	2.751850	0.423936
		1,879,182	293,168	15.6%	2.684546	0.418811
		1,927,200	306,714	15.9%	2.753143	0.438163
		1,883,317	301,970	16.0%	2.690453	0.431386
3/25	AP 08	1,804,459	291,731	16.2%	2.577799	0.416759
		1,937,857	285,293	14.7%	2.768367	0.407561
		2,052,014	327,228	15.9%	2.931449	0.467469
		2,147,594	250,542	11.7%	3.067991	0.357917
4/22	AP 09	1,759,623	292,125	16.6%	2.513747	0.417321
		1,836,526	296,158	16.1%	2.623609	0.423083
		2,399,336	327,669	13.7%	3.427623	0.468099
		1,813,098	294,743	16.3%	2.590140	0.421061
5/20	AP 10	1,659,821	282,215	17.0%	2.371173	0.403164
		1,729,655	288,507	16.7%	2.470936	0.412153
		2,029,541	338,777	16.7%	2.899344	0.483967
		2,391,811	362,171	15.1%	3.416873	0.517387
6/17	AP 11	2,065,549	346,040	16.8%	2.950784	0.494343
		2,104,979	360,430	17.1%	3.007113	0.514900
		1,824,261	311,833	17.1%	2.606087	0.445476
		2,215,799	385,761	17.4%	3.165427	0.551087
7/15	AP 12	2,196,353	366,138	16.7%	3.137647	0.523054
		2,242,083	394,342	17.6%	3.202976	0.563346
		2,281,193	396,110	17.4%	3.258847	0.565871
		2,330,214	411,941	17.7%	3.328877	0.588487
8/12	AP 13	2,384,992	418,155	17.5%	3.407131	0.597364
		2,477,428	423,867	17.1%	3.539183	0.605524
		2,522,553	428,295	17.0%	3.603647	0.611850
		2,346,795	391,383	16.7%	3.352564	0.559119

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

UPS/USPS-T1-56. Provide the volume of window-entered Priority Mail pieces for which Delivery Confirmation was purchased by week for FY2000.

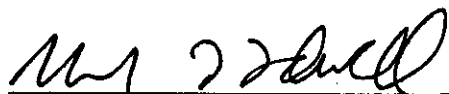
RESPONSE:

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 made 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-T1-55.

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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