

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF AMAZON.COM, INC.
REDIRECTED FROM WITNESS XIE
(AMZ/USPS-T2-9)

The United States Postal Service hereby provides the response of the United States Postal Service to the following interrogatory of Amazon.com, Inc.: AMZ/USPS-T2-9, filed on November 13, 2001. Interrogatory AMZ/USPS-T2-9 was redirected from witness Xie.

The 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

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
November 21, 2001

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TO INTERROGATORY OF AMAZON.COM, INC.
(REDIRECTED FROM WITNESS XIE)

AMZ/USPS-T2-9.

What is the average distance for mail transported to Zone 5? To Zone 6?
To Zone 7?

RESPONSE

Such data are not available for all mail.

For Parcel Post, the average Great Circle Distances (GCD) for Zone 5 through Zone 7 can be developed using numbers contained in the Library Reference USPS LR-J-67, Attachment G. The following table shows the calculation.

Zone	Cubic foot Miles (Page 397 of LR-J-67)	Cubic Feet (Page 349 of LR-J-67)	Average GCD (cfm / cf)
Zone 5	4,114,571,164	5,053,484	814
Zone 6	3,398,685,692	2,867,278	1,185
Zone 7	3,074,877,844	1,916,650	1,604

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.

Kenneth N. Hollies

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