

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T28-6-13, 16-19)

The United States Postal Service hereby provides the responses of witness Moeller to the following interrogatories of United Parcel Service: UPS/USPS-T28-6 through 13 and 16 through 19, filed on November 7, 2001.

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

Responses to UPS/USPS-T28-14, 15 and 20 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
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RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-5. Using Origin Destination Information System ("ODIS") data, provide separately the portion of FY2000 Priority Mail volume sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day:
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-c) See response to OCA/USPS-103, Attachment A, pages 4-6.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-6. Using Origin Destination Information System ("ODIS") data, provide separately the portion of Priority Mail volume for any available FY2001 quarters sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

(a-c) See response to OCA/USPS-103, Attachment A, pages 1-3.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-7. Using Priority End-To-End ("PETE") data, provide separately the portion of FY2000 Priority Mail volume sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-b) See response to OCA/USPS-103, Attachment C.
- (c) Not applicable.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-8. Using Priority End-To-End ("PETE") data, provide separately the portion of Priority Mail volume for any available FY2001 quarters sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-b) See response to OCA/USPS-103, Attachment C.
- (c) Not applicable.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-9. Using External First-Class ("EXFC") system data, provide the portion of FY2000 First-Class Mail volume sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-c) See response to OCA/USPS-103, Attachment C.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-10. Using External First-Class ("EXFC") system data, provide the portion of First-Class Mail volume for any available FY2001 quarters sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-c) See response to OCA/USPS-103, Attachment C.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-11. Using Origin Destination Information System ("ODIS") data, provide the portion of FY2000 First-Class Mail volume sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-c) See response to OCA/USPS-103, Attachment B, pages 4-6.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-12. Using Origin Destination Information System ("ODIS") data, provide the portion of First-Class Mail volume for any available FY2001 quarters sent within:

- (a) a one-day service area that arrived:
 - (i) in one day;
 - (ii) in more than one day;
- (b) a two-day service area that arrived:
 - (i) in two days;
 - (ii) in less than two days;
 - (iii) in more than two days; and
- (c) a three-day service area that arrived:
 - (i) in three days;
 - (ii) in less than three days;
 - (iii) in more than three days.

RESPONSE:

- (a-c) See response to OCA/USPS-103, Attachment B, pages 1-3.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-13. Provide recent national performance data from the External First-Class ("EXFC") measurement system for every category of mail available (e.g., flats, letters, small parcels and rolls, handwritten, type written, bar-coded, etc.).

RESPONSE:

EXFC – BY INDICIA

FY	SERV	INDICIA	
		METERED %ONTIME	STAMPED %ONTIME
2000	1	93.91	93.69
	2	86.74	85.65
	3	85.14	82.96
*TOTAL	2000	89.53	88.46
2001	1	93.55	93.42
	2	84.91	83.87
	3	81.31	79.62
*TOTAL	2001	87.71	86.79

EXFC – BY SHAPE

FY	SERV	SHAPE		
		CARD %ONTIME	FLAT %ONTIME	LETTER %ONTIME
2000	1	90.52	85.79	94.45
	2	82.34	70.42	87.48
	3	79.85	67.02	85.67
*TOTAL	2000	85.13	76.27	90.11
2001	1	89.26	84.63	94.21
	2	78.10	68.04	85.78
	3	76.70	61.90	82.14
*TOTAL	2001	82.40	73.42	88.45

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
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RESPONSE to UPS/USPS-T28-13 (continued):

EXFC – BY ADDRESS PRINTING

FY	SERV	ADDR PRINTED %ONTIME	WRITTEN %ONTIME
2000	1	94.08	93.13
	2	86.93	84.65
	3	85.32	81.63
*TOTAL 2000		89.70	87.57
2001	1	93.75	92.80
	2	85.15	82.73
	3	81.58	78.25
*TOTAL 2001		87.92	85.81

EXFC – BARCODE USAGE

FY	SERV	PREBARC NOT PRE B/C %ONTIME	PRE-BARCODE %ONTIME
2000	1	93.51	94.45
	2	85.83	88.13
	3	83.24	86.68
*TOTAL 2000		88.49	90.68
2001	1	93.11	94.18
	2	83.86	86.46
	3	79.67	82.85
*TOTAL 2001		86.63	89.06

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UPS/USPS-T28-16. Provide separately the average length of haul for First-Class Mail within the following service areas:

- (a) one day;
- (b) two days;
- (c) three days.

RESPONSE:

Length-of-haul data by service area are not available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
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UPS/USPS-T28-17. Provide separately the average length of haul for Priority Mail within the following service areas:

- (a) one day;
- (b) two days;
- (c) three days.

RESPONSE:

Length-of-haul data by service area are not available.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-18. Describe and quantify all improvements in Priority Mail service performance since FY1999.

RESPONSE:

Although they do not show improvement, measures related to Priority Mail service performance for this time period are provided in response to DFC/USPS-6 and OCA/USPS-100 and OCA/USPS-103.

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T28-19. Describe and quantify all improvements in First-Class Mail service performance since FY1999.

RESPONSE:

Measures related to First-Class Mail service performance for this time period are provided in response to DFC/USPS-5 and OCA/USPS-100 and OCA/USPS-103.

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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 21, 2001