

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN
(DBP/USPS-77)

The United States Postal Service hereby files its revised response to the following interrogatory of David Popkin: DBP/USPS-77, filed October 29, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 27, 2001

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DBP/USPS-77

Please refer to your response to DBP/USPS-24 subparts b to d.

- (a) Prior to the changes that were implemented in the past two years, please have Mr. Gannon and/or other qualified employee advise their best estimate of the percentage of 2-Day mail that was transported by surface, by commercial air transportation service, and by other means (specify the means and provide separate data for each means that transports 1% or more of the total volume).
- (b) Same as subpart (a) except for current data.
- (c) Same as subparts (a) and (b) except for 3-Day mail.

RESPONSE:

As explained in the response to DBP/USPS-24(b)-(d), the Postal Service's transportation data systems do not generate data that distinguishes mail traveling by a particular mode of transportation on the basis of whether that mail has 2-day service standard or a 3-day service standard. In FY 1999, it is estimated that, of total First-Class Mail volume by weight:

- 5.1 percent was transported by dedicated air service;
- 20.7 percent by commercial air service; and
- 74.2 percent by surface.

For the first three quarters of FY 2001, it is estimated that, of total First-Class volume by weight:

- 4.9 percent was transported by dedicated air service;
- 29.0 percent by commercial air service; and
- 76.1 percent by surface.

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RESPONSE to DBP/USPS-77 (continued):

At least 99 percent of surface transportation was provided by highway contract route service. It should be remembered that some mail referenced above traveled by more than one mode.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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