

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

RECEIVED

Nov 29 4 36 PM '01

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 UNITED PARCEL SERVICE
(UPS/USPS-16-21)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-16-21, filed on November 15, 2001. An objection to UPS/USPS-16 was filed on November 26. Interrogatories UPS/USPS 20 and 21 were redirected to USPS Witness Cochrane.

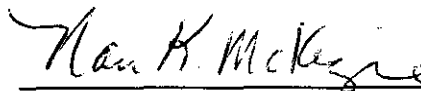
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenize

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089; Fax -5402
November 29, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-17.

- (a) Confirm that the only services of the United States Postal Service that are included in the American Society for Quality's American Customer Satisfaction Index ("ACSI"), Parcel Delivery and Express Mail Industry Segment, are Express Mail, Priority Mail, and Parcel Post.
- (b) Confirm that of the three entities included in the Parcel Delivery and Express Mail Industry Segment of the ACSI, only the United States Postal Service has shown a positive improvement in customer satisfaction since the ACSI began measuring this segment. If not confirmed, explain in detail.
- (c) Provide the results of the ACSI surveys separately for each of the Postal Service products included in the ACSI survey.

RESPONSE:

- (a) Not confirmed. The survey does not identify specific products for any of the companies in the survey. To be included in the survey for this industry, the respondents must have used parcel delivery, overnight and two-day mail delivery service in the past six months.
- (b) Confirmed.
- (c) The ACSI does not identify or rate specific products.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES

UPS/USPS-18. Refer to the Postal Service's response to interrogatory DFC/USPS-5. For each accounting period for each of the past three years, and for each category or type of First-Class Mail (excluding Priority Mail) for which the Postal Service collects data, provide nationwide data from Priority End-To-End ("PETE"), Origin Destination Information System ("ODIS"), and any other applicable systems showing:

(a) The percentage of the time that mail is delivered within the number of days specified by the applicable service standard; and

(b) The average number of days to delivery.

RESPONSE:

(a) Statistically reliable accounting-period data showing the percentage of the time that mail is delivered within the number of days specified by the applicable service standard and the average number of days to delivery are not available from ODIS and EXFC or any other system for First-Class Mail.

(b) See response to part (a).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES

UPS/USPS-19. Refer to the Postal Service's response to interrogatory DFC/USPS-6. For each accounting period for each of the past three years, provide nationwide data from Priority End-To-End ("PETE"), ODIS, and any other applicable systems showing for Priority Mail:

- (a) The percentage of the time that mail is delivered within the number of days specified by the applicable service standard; and
- (b) The average number of days to delivery.

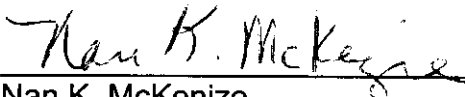
RESPONSE:

(a) Statistically reliable accounting-period data showing the percentage of the time that mail is delivered within the number of days specified by the applicable service standard and the average number of days to delivery are not available from ODIS and PETE or any other system for Priority Mail.

- (b) See response to part (a).

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.



Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 29, 2001