

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 KINGSLEY TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS KIEFER
(UPS/USPS-T33-6-8)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of United Parcel Service redirected from witness Kiefer: UPS/USPS-T33-6-8, filed on November 19, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 3, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM
WITNESS KIEFER

UPS/USPS-T33-6 Describe in detail all differences in the processing and delivery of Priority Mail pieces and Parcel Post pieces upon reaching the DDU.

Response:

Under normal circumstances, processing will be the same. However, if there are more parcel-shaped volume than the carrier can deliver that day, the carrier will deliver all the Priority Mail and handle the Standard Parcels and Parcel Post in accordance with local procedures. Frequently, this results in leaving the Standard Parcels and Parcel Post for delivery the next day. In addition, if Priority Mail arrives late at the DDU, expedited procedures (e.g., special transportation to the carrier on the route) may be used to ensure delivery the same day. Similar treatment would not be given to parcel post.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
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WITNESS KIEFER

UPS/USPS-T33-7 What percentage of Parcel Post pieces are delivered by the next business day upon reaching the DDU?

Response:

To the best of my knowledge, quantitative data to answer this interrogatory are not available. However, it is certainly less than 100 percent. See UPS/USPS-T33-6.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM
WITNESS KIEFER

UPS/USPS-T33-8 What percentage of Priority Mail pieces are delivered by the next business day upon reaching the DDU?

Response:

It is my understanding that it is virtually 100 percent. Exceptions would be in the event of extreme weather or if the business is closed on a normal business day (e.g., a restaurant closed on Monday).

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.

Joseph K. Moore

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