

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 MOELLER
(UPS/USPS-T28-24-26)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of United Parcel Service redirected from witness Moeller: UPS/USPS-T28-24-26, 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:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
December 3, 2001

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

UPS/USPS-T28-24. Describe in detail all differences in the processing and delivery of Priority Mail pieces and Parcel Post pieces upon reaching the DDU.

RESPONSE:

See my response to USPS/UPS-T33-6 redirected from witness Kiefer.

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

UPS/USPS-T28-25. What percentage of Parcel Post pieces are delivered by the next business day upon reaching the DDU?

RESPONSE:

See response to USPS/UPS-T33-7 redirected from witness Kiefer.

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

UPS/USPS-T28-26. What percentage of Priority Mail pieces are delivered by the next business day upon reaching the DDU?

RESPONSE:

See response to USPS/UPS-T33-8 redirected from witness Kiefer.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
December 3, 2001