

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS XIE TO INTERROGATORY OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS EGGLESTON
UPS/USPS-T25-27
(December 5, 2001)

The United States Postal Service hereby provides the response of witness Xie to the following interrogatory of United Parcel Service: UPS/USPS-T25-27, filed on November 21, 2001. Interrogatory UPS/USPS-T25-27 was redirected from witness Eggleston.

The 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

Kenneth N. Hollies

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.

Kenneth N. Hollies

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS EGGLESTON)

UPS/USPS-T25-27. Refer to the table of BY2000 Inter-BMC (Bulk Mail Center) Stop Days provided in your response to interrogatory PSA/USPS-T25-3, part (d). Provide the data for non-BMC Stop Days separately for Sectional Center Facilities ("SCF"s) and Associate Office/Destination Delivery Units ("AO/DDU"s). (a) Provide the same data (including, if available, the separation of non-BMC into SCFs and AO/DDUs) for intra-BMC highway service.

RESPONSE:

The following table shows the split between "SCF/P&DC"s and other facilities for all non-BMC Stop-days under the Inter-BMC contract type. The category "Others" includes annex, AO/DDU, AMF, etc. The facility type variable in NASS does not explicitly identify AOs or DDUs.

BY 2000 Inter-BMC Non-BMC Stop-Days

	PQ1	PQ2	PQ3	PQ4	BY2000
SCF/P&DC	71,616	72,000	71,148	95,168	309,932
Others	11,748	11,520	11,100	13,968	48,336
Total Inter-BMC	83,364	83,520	82,248	109,136	358,268

(a) The following table shows Intra-BMC stop-days separated by BMC, SCF/P&DC, and others:

BY 2000 Intra-BMC Stop-Days

	PQ1	PQ2	PQ3	PQ4	BY2000
BMC	130,068	131,580	138,840	186,160	586,648
SCF/P&DC	235,632	239,316	243,108	324,112	1,042,168
Others	92,196	92,544	100,536	134,016	419,292
Total Intra-BMC	457,896	463,440	482,484	644,288	2,048,108