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

DEC 7 4 46 PH '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 OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-254)

The United States Postal Service hereby provides its response to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-254, filed on November 23, 2001. Partial objections to OCA/USPS-248-253 were filed on December 3, 2001.

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

oseph K. Moore

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-3078 Fax –5402 December 7, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-254. Please refer to the response to interrogatory OCA/USPS-74. Percentage figures were provided for FY 2001 for Express Mail volume accepted for

- (1) overnight/noon delivery;
- (2) overnight/3:00 p.m. delivery, and
- (3) two-day delivery.

For the purpose of discerning a trend in Express Mail to offer speedier/slower service to more/fewer customers, please provide comparable percentage figures, broken down in the same three groupings as in the response to interrogatory 74, for FY1990 and FY1995.

RESPONSE:

The data requested are no longer available as Electronic Marketing Reporting System data are only maintained for two years.

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 7, 2001