

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID B. POPKIN (DBP/USPS-73) -- ERRATA

The United States Postal Service hereby provides its revised response to the following interrogatory of David B. Popkin: DBP/USPS-73, filed on November 26, 2001. The original response was filed on December 10, 2001. Only subpart (a) of the response is revised, and it supplements the information previously provided.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 20, 2001

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-73 Please confirm, or explain if you are unable to do so, that: [a] Priority Mail which is handled by Fedex will be transported through their hub in Memphis [disregard mail destined for the Memphis area which obviously will not be transported out of the hub]. [b] It is possible for mail which is destined to one point on the west coast from another nearby point on the west coast to travel the distance equivalent of the distance across the country because it travels into and out of the hub in Memphis. [c] The total distance that an article travels in going from A to B through the hub in Memphis will have very little relationship to the actual distance from A to B, namely, it will vary from being relatively equal to the distance from point A to B to being equal to approximately twice the distance between them.

RESPONSE

(a) No. The majority of Priority Mail handled by FedEx will be transported through their hub in Memphis; however, FedEx also routes some Priority Mail volume through their hub in Indianapolis as well as on a point-to-point aircraft from Nashua to Philadelphia to Miami and back.

(b) It depends what is meant by "nearby". Each office has its own policy for holding out Priority Mail to locations sufficiently "nearby". This hold out volume does not move via FedEx. However, it is possible that Priority Mail that is not held out will fly out and back via Memphis by FedEx.

(c) Assuming that the mail actual goes via FedEx through Memphis, the actual distance traveled may be the same, or longer than the direct distance from A to B., simply because the shortest distance between two points is a straight line.

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.



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