

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
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS KINGSLEY
(UPS/USPS-T39-66-67)

The United States Postal Service hereby provides the responses to the following interrogatories of United Parcel Service redirected from witness Kingsley: UPS/USPS-T39-66-67, filed on December 7, 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 21, 2001

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

UPS/USPS-T-39-66 Refer to your response to interrogatory UPS/USPS-T33-6 (redirected from Witness Kiefer).

- (a) How many pieces of parcel-shaped volume does a carrier typically deliver in a day? Provide a breakdown by type of carrier route.
- (b) How many pieces of parcel-shaped volume can a carrier typically deliver in a day? Provide a breakdown by type of carrier route.
- (c) How often is a carrier unable to deliver all of the parcel-shaped volume for his or her route in a particular day? Provide a breakdown by type of carrier route.
- (d) Is the decision that a carrier will not deliver all parcels at the Destination Delivery Unit (“DDU”) for his or her route in a given day made prior to the carrier leaving the DDU? If not, when is the decision made, and by whom?

Response:

- a. No reliable estimates at this level of disaggregation are available.
- b. There is no one number. Vehicle size is usually not an issue. Type of route usually does not matter either. For example, if it were a foot route a separate parcel run would deliver the volume.
- c. This information is not tracked.
- d. It is decided with the supervisor before the carrier leaves for the street whether he/she needs and receives assistance.

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

UPS/USPS-T-39-67 Refer to your response to interrogatory UPS/USPS-T33-6 (redirected from Witness Kiefer). Describe any “local procedures” regarding delivery of parcel-shaped volume in excess of what a carrier can deliver on a given day regarding delivery of such volume other than deferring its delivery to the next delivery day.

Response:

See response to UPS/USPS-T39-66d. redirected to the Postal Service.

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 21, 2001