

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-25-26, 28)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-25-26, 28, filed on December 10, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 26, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-25.

Refer to the Postal Service's response to interrogatory AMZ/USPS-T2-9 (redirected from witness Xie). For each zone, provide the average Great Circle Distance of the Parcel Post mail transported to that zone.

RESPONSE:

For Parcel Post, the average Greater Circle Distance (GCD) for all zones can be developed using numbers contained in Library Reference USPS LR-J-67,

Attachment G. The following table shows the calculation.

Zone	Cubic Foot Miles (page 397 of LR-J-67)	Cubic Feet (Page 349 of LR-J-67)	Average GCD (cfm / cf)
Zone 1/2	8,408,046,563	162,651,627	52
Zone 3	6,694,188,027	31,823,160	210
Zone 4	5,327,231,205	12,576,676	424
Zone 5	4,114,571,164	5,053,484	814
Zone 6	3,398,685,692	2,867,278	1,185
Zone 7	3,074,877,844	1,916,650	1,604
Zone 8	8,387,071,795	3,328,782	2,520

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-26.

Refer to the Postal Service's response to interrogatory AMZ/USPS-T2-9 (redirected from witness Xie).

- (a) For each zone, provide the average Great Circle Distance of the Priority Mail transported to that zone.
- (b) For unzoned Priority Mail, provide the average Great Circle Distance of the Priority Mail transported.

RESPONSE:

- (a) and (b). There are no data available to answer these questions.

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE**

UPS/USPS-28. Refer to the Postal Service's response to interrogatory UPS/USPS-T30-2 (redirected from witness Scherer) which discusses changes in Priority Mail service standards.

- (a) Provide the volume of Priority Mail moving between the 1,084 upgraded zip code [sic] pairs in FY2000 and FY2001.
- (b) Provide the volume of Priority Mail moving between the 104 downgraded zip code [sic] pairs in FY2000 and FY2001.

RESPONSE:

- (a) 105,923 and 113,062
- (b) 115,188 and 74,286

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.


Brian Reimer

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