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 MOELLER TO INTERROGATORY OF AMAZON.COM REDIRECTED FROM WITNESS MAYO (AMZ/USPS-T36-15)

The United States Postal Service hereby files the response of witness Moeller to the following interrogatory of Amazon.com, filed on December 10, 2001: AMZ/USPS-T36-15. The interrogatory has been redirected from witness Mayo to witness Moeller for response.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux Chief Counsel Ratemaking

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RESPONSE OF WITNES MOELLER TO INTERROGATORY OF AMAZON.COM REDIRECTED FROM WITNESS MAYO

AMZ/USPS-T36-15.

Since providing Package Services with Delivery Confirmation service adds "a high value of service" (USPS-T-36, p. 38, l. 12) would the proposed discontinuance of Delivery Confirmation service for flats within the Package Services mail class reduce the value of service of Package Services? Please explain any negative answer.

RESPONSE:

Witness Mayo was stating that Delivery Confirmation has a high value of service; her statement was not evaluating the value of service for the individual subclasses in Package Services. Nevertheless, the availability of Delivery Confirmation for Package Services customers does enhance the value of service somewhat, especially if the service is offered as a built-in feature. Restricting the availability of Delivery Confirmation for a small portion of volume for operational purposes might slightly reduce the value of service, if Delivery Confirmation were consistently provided for that portion of volume. However, value of service for Package Services might be about the same for either of two options: (1) an inconsistent Delivery Confirmation service offering for Package Services flats, and (2) no offering of Delivery Confirmation for those flats. A more reasonable expectation of whether Delivery Confirmation service will be fulfilled (due to a more certain identification of Delivery Confirmation items) might actually enhance the value of service for Package Services.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in Docket No. R2001-1.

Michael T. Tidwell

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