

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MOELLER  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(UPS/USPS-T28-14, 15, 46, 47)

The United States Postal Service hereby provides the responses of witness Moeller to the following interrogatories of United Parcel Service: UPS/USPS-T28-14 and 15 ( filed on November 7, 2001) and UPS/USPS-T28-46 and 47 (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:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
December 26, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T28-14.** Provide recent national performance data from the Priority End-To-End (“PETE”) measurement system for every category of mail available (e.g., flats, letters, Small Parcels and Rolls, handwritten, typewritten, bar-coded, etc.).

**RESPONSE:**

Since the system is not designed to derive data for these groupings, there are no data available that are responsive to this request.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T28-15.** Comparing External First-Class (“EXFC”) data and Priority End-To-End (“PETE”) data, provide the extent to which Priority Mail was delivered as fast or faster than First Class Mail for the 85 performance clusters included in the PETE system during each quarter of FY1999 and FY2000, and each available quarter of FY2001.

**RESPONSE:**

See response to POIR #6, Question 9, in Docket No. R2000-1 for the FY1999 data, and an explanation of the comparison of PETE and EXFC data. The following table provides data for FY2000 and FY2001 for the common service area between EXFC and PETE in a format consistent with the data provided in the POIR response cited above.

	Common ZIP Codes	Clusters better in EXFC	Clusters better in PETE
FY2000, PQ1	281	68	16
FY2000, PQ2	281	83	1
FY2000, PQ3	281	69	15
FY2000, PQ4	281	62	22
FY2001, PQ1	279	68	16
FY2001, PQ2	280	83	1
FY2001, PQ3	280	72	12
FY2001, PQ4	280	67	17

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T28-46.** Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that transportation legs in the two day service area for Priority Mail are longer than transportation legs for the two day service area in First Class Mail. If not confirmed, explain why not.

**RESPONSE:**

As indicated in response to OCA/USPS-304, Priority Mail has a larger number of two-day ZIP Code pairs than does First-Class Mail. By inference, then, it seems logical that the average length of the “transportation leg” for two-day Priority Mail is longer than the average length of the “transportation leg” for First-Class Mail.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T28-47.** Refer to pages 22-26 of your testimony, USPS-T-28, where you apply the ratemaking criteria to Priority Mail. Confirm that changes in mail mixes within classes, subclasses, and categories of mail can change costs of processing, transporting, and delivering mail. If not confirmed, explain why not.

**RESPONSE:**

Over time, if the mail mix changes, that, along with other factors, can affect the cost of the subclass.

## 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.

---

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
December 26, 2001