

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RE-DESIGNATION OF RESPONSES  
OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(UPS/USPS-T28-14 and 15) (ERRATA)

On December 26, 2001, the United States Postal Service filed responses to the following interrogatories of United Parcel Service that had been directed to witness Moeller on November 7, 2001: UPS/USPS-T28-14 and 15.

The responses were intended to have been redirected from witness Moeller to the Postal Service for institutional response. In preparing the electronic files transmitted by the witness filing, counsel mistakenly applied the wrong caption to the documents bearing the responses to UPS/USPS-T-28-14 and 15. As a consequence, the responses were inadvertently misidentified as responses from witness Moeller and filed under his name, when they had in fact been redirected to the Postal Service for institutional response.

Accordingly, the Postal Service hereby withdraws the wrongly-captioned December 26, 2001, answers to UPS/USPS-T28-14 and 15 and re-files those answers as institutional responses. There are no substantive changes to the answers. The attached responses supersede the wrongly-captioned responses filed yesterday.

Each interrogatory is stated verbatim and is followed by the correctly-captioned response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 27, 2001

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Michael T. Tidwell

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MOELLER

**Revised: December 27, 2001**

**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 THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MOELLER

**Revised: December 27, 2001**

**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

## **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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Michael T. Tidwell

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December 27, 2001