

RECEIVED

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

DEC 28 4 33 PM '01

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS MOELLER  
(UPS/USPS-T28-35)

The United States Postal Service hereby provides its response to the following interrogatory of United Parcel Service: UPS/USPS-T28-35, filed on November 29, 2001.

The interrogatory has been redirected from witness Moeller to the Postal Service for response.

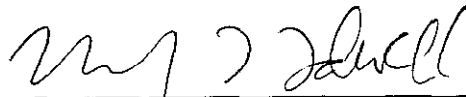
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3078, Fax -5402  
December 28, 2001

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

**UPS/USPS-T28-35.** Using PETE data, provide separately for FY1998, FY1999, FY2000, and FY2001 the number of Priority Mail pieces:

- (a) That were sent to destinations within a one-day service standard;
- (b) That were sent to destinations within a two-day service standard;
- (c) That were sent to destinations within a three-day service standard.

**RESPONSE:**

For all responses shown below, the term "Priority Mail pieces" is defined as the total Priority Mail volume that is represented by PETE, not the actual amount of test mail pieces that are used in the measurement system.

(a) – (c)

The PETE service performance measurement system does not test Priority Mail with a three-day service standard and only measures service performance for identified Priority Mail.

Priority Mail Volumes FY 1998

Service Standard	Priority Mail Volume
One Day	83, 576, 042
Two Day	439, 326, 418
Total	522, 902, 460

For FY 1999, refer to the Docket No. R2000-1, response to UPS/USPS-21. A copy is attached.

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

**RESPONSE to UPS/USPS-T28-35 (continued):**

Priority Mail Volumes FY 2000

Service Standard	Priority Mail Volume
One Day	88, 797, 626
Two Day	462, 266, 876
Total	551, 064, 502

Priority Mail Volumes FY 2001

Service Standard	Priority Mail Volume
One Day	94, 981, 353
Two Day	502, 978, 571
Total	597, 959, 924

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

UPS/USPS-21. Using PETE data, provide the number of Priority Mail pieces for FY1999:

- (a) that were sent to destinations within a one-day service standard;
- (b) that were sent to destinations within a two-day service standard; and
- (c) that were sent to destinations within a three-day service standard.

**RESPONSE:**

The PETE service performance measurement system does not test Priority Mail with a three-day service standard and only measures service performance for identified Priority Mail.

(a) - (c)

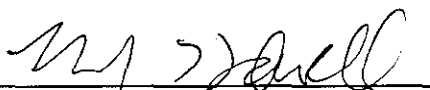
**PETE  
Priority Mail Volumes  
FY 1999**

Service Standard	Priority Mail Volume
One Day	86,609,090
Two Day	452,334,800
Total	538,943,890

Attachment to  
response to  
UPS/USPS-T28-35

**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 28, 2001