

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

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POSTAL RATE AND FEE CHANGES, 2001

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID B. POPKIN  
(DBPUSPS-92, 102)

The United States Postal Service hereby provides its responses to the following interrogatories of David B. Popkin: DBPUSPS-92, 102 filed on December 17, 2001.

An objection to DBP/USPS-93 was filed on December 27, 2001. Objections to the following interrogatories were filed on December 31, 2001: DBP/USPS-98(b) and 100(b). Responses to DBP/USPS-85-91, 94-98(a, c-d), 99, 100(a), 101, 103 are forthcoming.

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

  
\_\_\_\_\_  
Joseph K. Moore

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December 31, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID P. POPKIN**

**DBP/USPS-92:** Please refer to your response to DBP/USPS-74 subpart c. My interrogatory asked for the reasons [and the level of significance of each] why Express Mail rates were changed from a zoned rate system to an unzoned rate system. Which particular lines on page 588 of Docket R84-1 provide the response to this specific question?

**RESPONSE:**

See paragraph [5659].

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO FOLLOW-UP  
INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-102 Please refer to your response to DBP/USPS-73 subpart c. [a] Please confirm, or explain if you are unable to do so, that when Priority Mail travels through the FedEx Memphis Hub, the distance can range from the same distance such as when the mail is transported between Los Angeles and Columbia SC which are on an approximate straight line to a distance which is much greater than the direct distance, such as the example provided in POIR Number 5 / Question Number 8 for flight between Los Angeles and Sacramento - direct distance of 373 miles vs. an approximate distance of 3300 miles between them when flying through Memphis. [b] Please advise the relationship in air transportation costs as related to the distance traveled.

RESPONSE

- (a) Confirmed.
- (b) There is none. Please see USPS-T-17, p. 3. lines 14 - 16.

## 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.

  
\_\_\_\_\_  
Joseph K. Moore

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