

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CONSUMER ADVOCATE

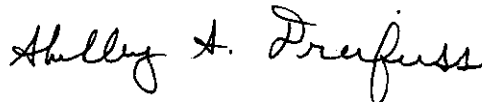
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-313)
January 2, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,



Shelley S. Dreifuss
Acting Director
Office of the Consumer Advocate

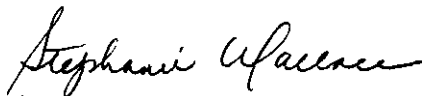
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OCA/USPS-313. The following refers to the USPS response to OCA/USPS-T30-17, redirected to the Postal Service. In the response, it is stated that figures on modes of transportation for Priority Mail are not available.

- (a) Please give ballpark estimates for the test year of the percentage of Priority Mail pieces that will be transported on (1) surface transportation, (2) passenger air transportation, and (3) by FedEx air. (If test year projections are too uncertain, then please provide an answer based upon current plans).
- (b) Even though precise figures are unavailable for modes of transportation, please give the general guidelines followed by the Postal Service for determining when to transport Priority Mail by surface modes, on passenger planes, or by FedEx air. Specifically address how the distances between originating and destinating facility are taken into account in selecting the mode of transportation.
- (c) Please provide ballpark estimates of the distances (and zones) primarily associated with surface transportation of Priority Mail and the distances (and zones) primarily associated with the air transportation of Priority Mail. Which zones have a fairly even mix of surface and air transportation? (Ballpark estimates are acceptable).

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
January 2, 2002