

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-313)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-313, filed on January 2, 2002.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

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RESPONSE OF THE UNTIED STATES POSTAL SERVICE TO INTEROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

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).

RESPONSE:

(a) As stated in response to OCA/USPS-T30-17, data are not available regarding the mix of modes used to transport Priority Mail. Therefore, there is limited basis to provide "ballpark" estimates. However, based on figures presented in USPS LR-J-94, Table 305, Test Year air volume traveling in containers bearing a "P" ACT type will be divided relatively equally between passenger air and FedEx air transportation on a weight basis. Determining the split of Priority Mail volume between surface and air is more problematic because no data are available regarding the volume of mail that travels on surface transportation.

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- (b) The guidelines followed by Postal Service employees regarding routing mail onto the appropriate transportation are described in Section 222 of Postal Service Handbook M-22, Dispatch and Routing Policy, which states, "The transportation policy of the U.S. Postal Service is to route the mail within the specified service windows for each class of mail, using the mode of transportation that provides the best combination of service and cost."
- (c) USPS LR-J-96, which calculates Priority Mail volumes by zone, shows that air volume traveling in containers bearing a "P" ACT type is most heavily concentrated in Zones 5-8 on a weight basis. This Library Reference also shows that relatively small amounts of "P" ACT type weight are transported in Zones 1-3. Because no data are available on the volume of Priority Mail that travels on surface transportation by zone, it is difficult to determine the mix of modes by zone. However, it is likely that Priority Mail in zones 1-3 is primarily transported via surface transportation, that Priority Mail in zones 5-8 is primarily transported via air transportation, and that zone 4 volume contains a mix of both surface and air volume.

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.

Brian M. Rěimer

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