

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS THOMAS M. SCHERER
(OCA/USPS-T30-19(a)-(c)) (Errata) (January 17, 2002)

The United States Postal Service hereby files a revised response to the following interrogatory of the Office of the Consumer Advocate (OCA): OCA/USPS-T30-19.

OCA filed this interrogatory on December 10, 2001. The Postal Service filed its original response, redirected from witness Thomas M. Scherer, on December 26, 2001. The Postal Service hereby revises that response in light of witness Spatola's revised response to POIR 5, question 8, which was filed on January 11, 2002. The only changes are to the air miles between Los Angeles, California and Eureka, California, and the air miles between Washington, DC, and Bangor, Maine. The interrogatory is stated verbatim, and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 17, 2002

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OCA/USPS-T30-19.

Please refer to witness Spatola's response to POIR No. 5, Question 8. For each of the city pairs listed, give the:

- (a) number of air miles traveled.
- (b) the Priority Mail zone.
- (c) the number of miles between the originating facility and the destinating facility.

RESPONSE:

- (a) For purposes of this response, the air miles traveled is assumed to be the Great Circle Miles on each air transportation leg of the routings specified in witness Spatola's response to POIR No. 5, Question 8. The resulting air mile calculations are presented in the table below in the column labeled (a). The first number in each routing is the sum of the air miles for each of the individual air legs. The miles on each air leg are listed below the total.
- (b) For the purposes of this response, the Priority Mail zone has been determined by comparing the number of miles calculated in part (c) to the standard Postal Service zone distances. The results are presented in the table below in the column labeled (b).
- (c) For the purposes of this response, the number of miles between the originating facility and destinating facility is assumed to be the Great Circle Miles between those two facilities. The results are presented in the table below in the column labeled (c).

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Routings	(a)	(b)	(c)
Miami, Florida and Chicago, Illinois:	1,331	6	1,190
FedEx Miami to the FedEx Memphis Hub	866		
FedEx Memphis Hub to FedEx Chicago	465		
Houston, Texas and Des Moines, Iowa:	979	5	816
FedEx Houston to the FedEx Memphis Hub	499		
FedEx Memphis Hub to FedEx Des Moines	480		
Los Angeles, California and Eureka, California:	0	4	575
Washington, DC and Bangor, Maine:	0	5	603
Nashville, Tennessee and Wichita, Kansas:	457	5	607
FedEx Memphis Hub to FedEx Wichita	457		

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. Reimer

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