

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 DAVID B. POPKIN
(DBP/USPS-83) (January 18, 2002)

The United States Postal Service hereby files its response to the following interrogatory of David B. Popkin: DBP/USPS-83.

Mr. Popkin filed this interrogatory on November 28, 2001. The Postal Service objected to it on December 10, 2001. Mr. Popkin filed a motion to compel a response on December 17, 2001. The Postal Service opposed Mr. Popkin's motion on December 26, 2001. On January 14, 2002, the Presiding Officer issued a ruling concerning numerous interrogatories filed by Mr. Popkin. As to subparts (a) through (c) of DBP/USPS-83, he directed the Postal Service to "identify examples of origin/destination Zip Code pairs within California that satisfy the criterion stated by Mr. Popkin." The Presiding Officer also directed the Postal Service to respond to subparts (d) and (e). Accordingly, DBP/USPS-83 is stated verbatim, and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 18, 2002

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DBP/USPS-83.

Please refer to the response made to Presiding Officers Information Request No. 5 Question No. 8 and, in particular, the response to subpart c. [a] Please provide a listing of the AMCs and PMPCs that are located within the state of California. [b] Please provide a listing for each California AMC/PMPC showing the other AMC/PMPCs that they typically forward Priority Mail to by a means other than through the FedEx Memphis Hub. [c] Please provide a listing of the three-digit ZIP Code prefixes that dispatch mail to and receive mail from each AMC/PMPC in California as well as those AMC/PMPCs that are not in California but appear in the response to subpart b.

[d] Please confirm, or explain if you are not able to do so, that virtually all Priority Mail originating in Los Angeles, California and destined to US points more than 1800 miles away will typically be transported through the FedEx Memphis Hub. [e] Please confirm, or explain if you are unable to do so, that all Priority Mail which is transported by FedEx air to and/or from the FedEx Memphis Hub will typically be transferred to or from FedEx at a USPS AMC or PMPC.

RESPONSE.

(a)-(c). As modified by Presiding Officer's Ruling Number 32, the question now seeks an identification of "examples of origin/destination ZIP Code pairs within California" which are no more than 3 postal zones apart and have their Priority Mail routed via the FedEx Memphis hub. There are no known examples of such city pairs that routinely route Priority Mail through Memphis via FedEx. The normal routing of Priority Mail within zone 3 would be a surface, typically highway routing. The revised response to Presiding Officer's Information Request Number 5, question 8, subpart (c), is a typical example of such a surface routing within California.

(d). Confirmed.

(e). Not confirmed. Priority Mail that is transported by FedEx air, to and/or from the FedEx Memphis Hub, typically will be transferred to or from FedEx at a local FedEx facility.

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.

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