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

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Postal Rate and Fee Changes, 2001	:	Docket No. R2001-1
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NOTICE OF UNITED STATES POSTAL SERVICE OF FILING OF APWU RESPONSE TO HEARING ROOM QUESTION TO BE INCLUDED IN EVIDENTIARY RECORD

In accordance with Presiding Officer's Ruling No. R2001-1/51 (February 22, 2002), the United States Postal Service hereby files, for inclusion in the evidentiary record at the today's hearings, two copies of the response of the American Postal Workers Union, AFL-CIO, to a question directed by the Postal Service to APWU witness Riley during cross-examination at the hearing on February 14, 2002.

The question is paraphrased and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell	

February 26, 2002

CERTIFICATE OF SERVICE

I her	eby certify that	I have this day	y served the t	foregoing	documer	it upon
all participa	nts of record in	this proceeding	ng in accorda	nce with s	section 12	of the
Rules of Pra	actice.	•				

Michael T. Tidwell

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February 26, 2002

RESPONSE OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO TO QUESTION POSED BY THE POSTAL SERVICE AT HEARINGS

Tr. 12/4930

QUESTION

In comparison to current First-Class Mail rates, please state the percentage rate change that you are proposing for each First-Class Mail rate category or rate element.

RESPONSE

Please see the attached Table.

RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO QUESTION POSED AT HEARINGS

Attachment to Response to Question Posed at Tr. 12/4390

Percent Change in Propo	osed APWU	First-Class Mail Ra	tes Compared with	Current First-Cla	ss Mail Rates
	Current	APWU Proposed	Percent Change	APWU	Percent Change
	First-	Rates Based on	from Current to	Proposed Rates	from Current to
	Class	80 Percent	Proposed Rates,	Based on 100	Proposed Rates,
	Rates	Pass Through	Table I	Percent Pass	Table II
	(1)	(2)		Through	
				(2)	
Letters and Sealed Parcels				,	
Regular					
Single-Piece First Ounce	34.0	37.0	8.8%	37.0	8.8%
QBRM	31.0	36.4	17.4%	36.2	16.8%
Nonautomation Presort	32.2	36.4	13.0%	36.2	12.4%
Additional Ounce					
Single Piece	23.0	23.0	0.0%	23.0	0.0%
Presort	23.0	23.0	0.0%	23.0	0.0%
Automation Presort					
Letters					
Mixed AADC Presort	28.0	33.0	17.9%	32.0	14.3%
AADC Presort	28.0	32.3	15.4%	31.1	11.1%
3-Digit Presort	26.9	32.0	19.0%	30.8	14.5%
5-Digit Presort	25.5	31.1	22.0%	29.6	16.1%
Carrier-Route Presort	24.5	31.1	26.9%	29.6	20.8%
Flats					
Mixed ADC Presort	31.2	37.0	18.6%	37.0	18.6%
ADC Presort	31.2	37.0	18.6%	37.0	18.6%
3-Digit Presort	29.7	37.0	24.6%	37.0	24.6%
5-Digit Presort	27.7	31.1	12.3%	30.2	9.0%
Additional Ounce	23.0	23.0	0.0%	23.0	0.0%
Cards					
Regular		25.5	A		<u> </u>
Single-Piece	21.0	23.0	9.5%	23.0	9.5%
Nonautomation Presort	19.0	22.4	17.9%	22.2	16.8%
QBRM	18.0	22.4	24.4%	22.2	23.3%
Automation-Presort	17.4	22.0	26.407	21.7	24.70/
Mixed AADC Presort	17.4	22.0	26.4%	21.7	24.7%
AADC Presort	17.4	21.6	24.1%	21.2	21.8%
3-Digit Presort	16.8	21.5	28.0%	21.1	25.6%
5-Digit Presort	16.1	21.0	30.4%	20.5	27.3%
Carrier-Route Presort	15.0	21.0	40.0%	20.5	36.7%

^{1.} Current First-Class Mail Rates are from Table 1 of Witness Robinson, USPS-T-29

^{2.} From Table I and Table II, Testimony of Michael Riley, APWU-T-1