

DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MAYES TO INTERROGATORIES OF DAVID B. POPKIN  
REDIRECTED FROM THE POSTAL SERVICE  
(DBP/USPS-43(C), 44(B)-(D), 48 & 49)

The United States Postal Service hereby provides responses of witness Mayes to the following interrogatories of David B. Popkin: DBP/USPS-T43(c), 44(b)-(d), 48 & 49, filed on September 10, 1997, and redirected from the Postal Service.

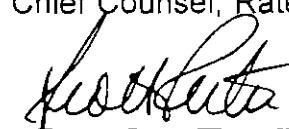
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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September 29, 1997

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO DBP INTERROGATORIES  
REDIRECTED FROM THE POSTAL SERVICE

DBP/USPS-43. [c] Since the costs are the same for Zones 1 through 5, what is the justification for rates which are distance related, namely, they are based on the different zones?

Response:

[c] Please refer to my responses to FGFS/USPS-T37-1 and 10, and UPS/USPS-T37-29 and 37. Given the necessity to develop rates that conformed to the directions provided by postal management as well as restrained the sizes of the rate changes from the existing structure, it was not possible to move to a rate structure that completely reflected the transportation cost analysis.

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DBP/USPS-44. [b] Confirm, or explain if you are unable to do so, that the rates for Inter-BMC parcel post are based on the zone between the origin and destination of the parcel. [c] Confirm, or explain if you are unable to do so, that the zones that are utilized in parcel post rates are based on the distance between the three-digit prefixes of the origin and destination of the parcel. [d] Confirm, or explain if you are unable to do so, that the zones are not directly based on the distance between the origin and destination BMC.

Response:

[b] Confirmed.

[c] Confirmed.

[d] Confirmed. Please refer to the responses of witness Hatfield to your interrogatory DBP/USPS-46.

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DBP/USPS-48. [a] Confirm that the proposed rates for Destination SCF and Destination Office parcel rates will be less than [sic] the proposed Local Intra-BMC parcel rates. [b] If not, explain and enumerate. [c] Confirm that Destination SCF mailings may require some sortation by the SCF and most will require transportation to the individual offices. [d] If not, explain. [e] Based on this, explain the justification and rationalization for having the two Destination rates less than the individual Local Intra-BMC rate.

Response:

[a] Confirmed.

[b] Not applicable.

[c] Not confirmed.

[d] In order for Parcel Post pieces to qualify for the DSCF rate, they must be presorted to the 5-digit level in order to avoid sortation at the destination P&DC. Further, when a delivery unit is co-located with a P&DC, no transportation is required beyond the destination P&DC.

[e] Please refer to my workpapers for the full development of the proposed Parcel Post rates. I note that the cost analysis contained in the testimony of witness Hatfield (USPS-T-16) shows lower unit transportation costs for DSCF and DDU Parcel Post than for local zone intra-BMC Parcel Post. For an explanation of this result, please see UPS/USPS-T-16-3. Furthermore, I refer you to the testimony of witness Crum for the development of the nontransportation cost savings associated with DSCF and DDU.

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DBP/USPS-49. [a] Confirm that the ability to mail packages with a length plus girth of between 108 and 130 inches will not be extended to individual parcel mailers. [b] If so, why was this ability denied? [c] If not, how will the ten percent limit be satisfied?

Response:

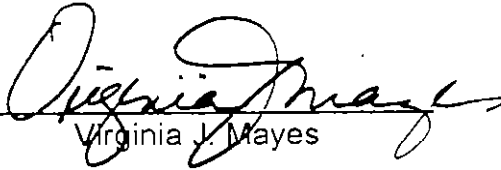
[a] Confirmed.

[b] Please refer to my response to OCA/USPS-T37-5.

[c] The mail preparation and verification procedures have not been produced or finalized, but the proposed DMCS language regarding the oversized pieces indicates that such pieces may "constitute no more than 10 percent of the total number of Parcel Post pieces mailed as part of a single mailing."

## DECLARATION

I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
Virginia J. Mayes

Dated: Sept. 29, 1997

## 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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Scott L. Reiter

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