

DOCKET SECTION

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

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OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESSES WADE AND TAKIS
(UPS/USPS-T20-9 - 16, UPS/USPS-T41-35)

The United States Postal Service hereby provides responses to the following interrogatories of United Parcel Service, filed on September 17, 1997: UPS/USPS-T20-9 - 16, redirected from witness Wade, and UPS/USPS-T41-35, redirected from witness Takis. Other portions of the same UPS set to Wade (4-18) have been redirected to witness Nieto, while still others have also been redirected to the Postal Service.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 1, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-9. On average, is mail carried by VSD more or less time-sensitive than mail carried by HCR? Please explain your response.

RESPONSE

The Postal Service has not studied this issue and therefore does not have the data to provide. Routes are assigned to VSD or HCR based on cost factors, given that both are able to meet service standards.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-10. On average, is cube utilization better on VSD segments or on HCR segments?

RESPONSE

The Postal Service has not studied this issue, and therefore does not have data to provide.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-11. For the Base Year, what percentage of VSD routes are scheduled, as opposed to ad hoc?

RESPONSE

The question is unclear. The Postal Service does not schedule anything it calls "ad hoc"

VSD transportation on a route by route basis.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-12. For the Base Year, what percentage of HCR routes are scheduled, as opposed to ad hoc?

RESPONSE

The question is unclear. The Postal Service does not schedule anything it calls "ad hoc" HCR transportation on a route by route basis.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-13. Please explain the complete decision-making process of assigning mail to either VSD or HCR.

RESPONSE

It is Postal Service policy not to have PVS and HCR run between the same origin/destination pairs. VSD and HCR compete for mail routes on a cost-benefit-service basis. The winner of the competition gets the mail. The analysis is done at the local level and systematically reviewed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-14. Please explain the complete decision-making process concerning which type of truck to load first, including at a minimum, a comparison of VSD trucks vs. HCR trucks.

RESPONSE

The loading of a truck, either HCR or VSD, is dependent on the availability of mail, dispatch times, and service requirements. VSD trucks and HCR trucks have dedicated routes and mail. The routes and schedules of both are part of the Postal Service's nationwide transportation network. The loading and unloading of trucks are dependent on these schedules, which are based on the availability and dispatch time of the truck's dedicated mail. Because of rolling containers, drivers can load and unload trucks with minimal or no assistance in a very short time. Unloaded mail is placed in predetermined staging areas; similarly, mail to be loaded is retrieved from staging areas. Tractors can detach and hitch trailer loads quickly as well. Trailer loads may be staged for unloading if no bays are available. Trailer loads of like mail are unloaded on a first-in, first-out basis consistent with service standards. Trailer loads for dispatch are released based on the schedule.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-15. Please explain the complete decision-making process concerning which type of truck to unload first, including at a minimum, a comparison of VSD trucks vs. HCR trucks.

RESPONSE

All trucks, VSD or HCR, are unloaded via first-come first-served basis with the exception of a priority shipment that would take first precedence. For a full discussion, please see the response to UPS/USPS-T20-14.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO UPS INTERROGATORIES (REDIRECTED FROM WITNESS WADE)

UPS/USPS-T20-16. Would it be accurate to say that, on average, preferential freight is more likely to travel on VSD than on HCR? If not, please explain.

RESPONSE

The Postal Service does not handle freight. As suggested by the response to UPS/USPS T20-13, preferential mail would travel on either PVS or HCR depending on which mode served the destination. With respect to your specific question, the Postal Service has not studied this issue, and therefore has no basis to respond.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF UNITED PARCEL SERVICE
(REDIRECTED FROM WITNESS TAKIS)

UPS/USPS-T41-35 Please provide the piece volumes of mail moving through the Eagle network during the base year separately for (a) First-Class Mail, (b) Express Mail, and (c) Priority Mail.

RESPONSE

This information is not available.

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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