

REVISÉD RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Postal Rate Commission
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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

REVISÉD RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-18 [ERRATUM])
(May 26, 2005)

The United States Postal Service hereby provides its revised response to interrogatory OCA/USPS-18. That interrogatory was filed on May 6, 2005, and the initial response was filed on May 20. However, part (e) of the question and any indication in the response that part (e) was being answered were both missing. The revised response remediates these shortcomings.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

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OCA/USPS-18. Please refer to USPS-LR-K-82, the ODIS Quarterly Statistics Reports.

- a. Please confirm that ODIS is the only data or measurement system that provides the average number of days to delivery for the mail classes and groups listed. If you do not confirm, please explain.
- b. Please confirm that ODIS is the only data or measurement system that provides the percentage of mail delivered for Day 1 through Day 10 for the mail classes and groups listed. If you do not confirm, please explain.
- c. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10. If you do not confirm, please explain.
- d. Please confirm that ODIS is the only data or measurement system that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for the mail classes and groups listed. If you do not confirm, please explain.
- e. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and Inter-P&DC volume, and the average number of days to delivery for such volume. If you do not confirm, please explain.

RESPONSE:

a-b, d. Not confirmed. See e.g., the responses to DFC/USPS-5 and 7.

c,e. Partially confirmed. ODIS does provide information that is not duplicated elsewhere, but reliance only upon information uniquely available from ODIS would not, by itself, provide a sufficient basis for a meaningful comparison. Despite the surface attraction of comparing First-Class Mail to Priority Mail delivery performance using ODIS-RPW data, that surface perspective fails to recognize material distinctions between the two including such factors as shape, relative numbers of origin/destination pairs with a particular service standard, and respective haul profiles. Opinions about the relative service performance of First-Class Mail and Priority Mail could conceivably rely upon other information, including data from EXFC and PETE as well as personal experience. See also the response to DFC/USPS-26.