

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

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

Docket No. R2005-1

RESPONSES OF POSTAL SERVICE WITNESS LEWIS
TO INTERROGATORIES OF VALPAK (VP/USPS-T30-22-23)
(June 13, 2005)

The United States Postal Service hereby provides the response of witness Lewis to the following interrogatories of ValPak, filed on May 19, 2005: VP/USPS-T30-22-23. The response to question 21 is still awaiting input from Memphis and has not yet been completed.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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June 13, 2005

RESPONSES OF USPS WITNESS LEWIS TO INTERROGATORIES OF
VALPAK DEALERS ASSOCIATION

VP/USPS-T30-22.

a. In Base Year 2004, what was the average number of pieces delivered each day by city carriers on (i) foot routes, (ii) park and loop routes, and (iii) curblines routes?

b. Your testimony at page 4 states that “[w]ith increasing deliveries per route, carriers must transport and deliver more mail during the course of the day.” (USPS-T-30, p. 4, ll. 15-16.) Please indicate the extent to which the volume of mail delivered by city carriers has changed since 1993, when “the Postal Service introduced delivery point sequencing (DPS) of letter shaped mail on automated mail processing equipment.” (USPS-T-30, p. 2, ll. 10-11.)

Response

A. The Postal Service does not maintain statistics showing volume by route classification.

B. The Postal Service does not have a national system that shows delivered volume from 1993. I based the statement you have quoted from my testimony upon personal experience. However, the following volume data from Annual Reports and route data from the Address Management System illustrate the point.

Year	Volume	Routes
1993	171,022.0	
1994	178,039.4	244,793
1995	180,733.7	
1996	183,439.5	239,453
1997	190,888.1	239,422
1998	196,904.7	242,224
1999	201,643.5	245,102
2000	207,882.2	248,824
2001	207,462.6	250,091
2002	202,821.9	248,436
2003	202,184.7	247,783
2004	206,105.6	248,061

RESPONSES OF USPS WITNESS LEWIS TO INTERROGATORIES OF
VALPAK DEALERS ASSOCIATION

VP/USPS-T30-23.

a. In Base Year 2004, what was the average weight of the pieces delivered each day by city carriers on (i) foot routes, (ii) park and loop routes, and (iii) curblin routes?

b. Your testimony at page 4 states that “[a]dditionally, today’s mail is bulkier than before, because customers receive more flat and package-shaped mail than they did in the 1980s.” (USPS-T-30, p. 4, ll. 16-18.) Please indicate the extent to which the weight of mail delivered by city carriers has changed since 1990. VP/USPS-T30-21.

Response

A and B. The Postal Service does not maintain statistics showing the weight of mail delivered by route. I based the statement you have quoted from my testimony upon personal experience. However, the following Revenue, Pieces, and Weight system data from Annual Reports and route data from the Address Management System illustrate the point.

Year	Weight	Routes
1993	19,598.3	
1994	21,026.5	244,793
1995	21,925.7	
1996	21,873.0	239,453
1997	23,352.4	239,422
1998	24,812.3	242,224
1999	25,562.2	245,102
2000	26,840.6	248,824
2001	25,975.9	250,091
2002	24,562.7	248,436
2003	24,851.9	247,783
2004	25,280.9	248,061

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

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