

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-75-76)
(June 17, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DFC/USPS-75-76, submitted on June 3, 2005.

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

Keith E. Weidner

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6252, Fax -3084

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DOUGLAS F. CARLSON INTERROGATORY

DFC/USPS-75. Please refer to the response to DFC/USPS-21(c).

- (a) Please explain how and why data maintained in the CBMS at the headquarters level may have differed from data maintained in the CBMS at the district level. If one reason is that districts upload data to the headquarters level only periodically, in your response please identify how often districts upload data to the headquarters level.
- (b) Please confirm that the CBMS data held at the district level more accurately reflect actual operational data, including the number of collection boxes, than CBMS data held at the nationwide level. If you do not confirm, please explain.

RESPONSE:

a) The differences between the data in the National-level and District-level CBMS files result from the structure of the National CBMS file. The National-level file does not contain all the data in the District file. The Districts provided monthly updates (which leads to day-to-day differences), and, at any given time, some District's upload may not have been completed.

b) The National CBMS file does not contain all of the detail data in the District-level CBMS file. With the upload of District data, as described above, the National and District files matched with regard to the number of collection boxes.

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DFC/USPS-76. Please refer to the response to DFC/USPS-58.

- (a) Please select a weekday between June 6, 2005, and June 17, 2005. For an average origin ZIP Code on the selected weekday, please provide the number of ZIP Codes to which Next Day Service is available.
- (b) For an average origin ZIP Code on Saturday, June 11, 2005, or Saturday, June 18, 2005, please provide the number of ZIP Codes to which Next Day Service is available.
- (c) Please select a weekday between June 6, 2005, and June 17, 2005. For an average origin ZIP Code on the selected weekday, please provide the number of addresses to which Next Day Service is available.
- (d) For an average origin ZIP Code on Saturday, June 11, 2005, or Saturday, June 18, 2005, please provide the number of addresses to which Next Day Service is available.

For this interrogatory, data for an average origin ZIP Code may be calculated by adding the number of ZIP Codes (or addresses) to which Next Day Service is available for each origin ZIP Code nationwide and then dividing this sum by the total number of ZIP Codes. If a different calculation is used to define an average origin ZIP Code, please explain the calculation. If an average origin ZIP Code cannot be calculated, please provide the data for a typical or representative origin ZIP Code.

RESPONSE:

Please see the response to DFC/USPS-58 for a discussion of an “average origin ZIP Code.” The data below is provided for ZIP Code 10001.

(a) ZIP Code 10001 would service 16,577 ZIP Codes Next Day if acceptance is on Monday, June 6th, 2005.

(b) ZIP Code 10001 would service 8,830 ZIP Codes Next Day if acceptance is on Saturday, June 11th, 2005.

(c) ZIP Code 10001 would service 82.5 million addresses if acceptance is on Monday, June 6th, 2005.

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(d) ZIP Code 10001 would service 64.8 million addresses if acceptance is on Saturday,
June 11th, 2005.