

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

RESPONSE OF POSTAL SERVICE WITNESS LEWIS
TO INTERROGATORY OF VALPAK (VP/USPS-T30-21)
(June 17, 2005)

The United States Postal Service hereby provides the response of witness Lewis to the following interrogatory of ValPak, filed on May 19, 2005: VP/USPS-T30-21.

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

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, Fax -5402
June 17, 2005

RESPONSES OF USPS WITNESS LEWIS TO INTERROGATORIES OF
VALPAK DEALERS ASSOCIATION

VP/USPS-T30-21.

a. In Base Year 2004, what was the average number of stops, or possible deliveries, for city carrier (i) foot routes, (ii) park and loop routes, and (iii) curblines routes?

b. Your testimony at page 4 states that, “[b]ecause automation reduced carrier inoffice time, routes serve increasing numbers of deliveries and cover more delivery territory.” (USPS-T-30, p. 4, ll. 13-15.) Please indicate the extent to which the average number of deliveries 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.) If the percentage change in the average number of deliveries differs according to type of route, please show separately each type of route.

Response

A and B. Please see the tables below. Please note that statistics showing possible deliveries by delivery mode are not available prior to FY 2002 and possible delivery and route statistics are not available for FYs 1993 and 1994.

CITY MODE TYPE	2002	2003	2004	May 2005
CURB	21,101,098	21,322,172	21,658,994	21,798,457
DISMOUNT	13,826,711	14,022,139	14,276,827	14,583,688
FOOT	6,314,035	6,211,285	6,030,239	5,920,429
OTHER	222,082	221,985	321,311	303,815
PARK_LOOP	42,607,810	42,706,141	42,825,190	42,891,006
TOTALS	84,071,736	84,483,722	85,112,561	85,497,395
CURB	25.10%	25.24%	25.45%	25.50%
DISMOUNT	16.45%	16.60%	16.77%	17.06%
FOOT	7.51%	7.35%	7.09%	6.92%
OTHER	0.26%	0.26%	0.38%	0.36%
PARK_LOOP	50.68%	50.55%	50.32%	50.17%

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City Routes	Foot	Park & Loop	Curbline	Dismount	Other	Total
1993						
1994	24,288	101,814	35,309	16,270	2,051	179,732
1995						
1996	20,357	90,194	36,714	18,827	2,165	168,257
1997	16,870	88,424	37,436	21,483	2,014	166,227
1998	15,448	87,918	38,613	22,661	1,715	166,355
1999	14,397	89,388	38,761	23,392	1,472	167,410
2000	13,513	89,781	39,237	24,939	920	168,390
2001	12,800	89,690	39,310	25,314	901	168,015
2002	12,148	88,421	38,982	25,549	799	165,899
2003	11,786	88,265	38,677	25,372	875	164,975
2004	11,470	87,825	38,696	25,440	1,020	164,451

FY	Total Routes	Total PDs	PDs/Route
1993			
1994	244,793	123,985,589	506
1995			
1996	239,453	129,306,538	540
1997	239,422	131,165,414	548
1998	242,224	132,593,413	547
1999	245,102	134,052,674	547
2000	248,824	135,946,051	546
2001	250,091	137,682,307	551
2002	248,436	139,401,798	561
2003	247,783	141,273,118	570
2004	248,061	142,188,093	573

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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