

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 DAVID B. POPKIN
(DBP/USPS-174-176)
(July 5, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DBP/USPS-174-176, submitted on June 17, 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.
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RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-174. Please refer to your response to DBP/USPS-105. Please confirm, or explain if you are unable to confirm, that the right hand column should read 100.00 for all three service standards.

RESPONSE:

Not confirmed. The column headings in DBP/USPS-105 were meant to conform exactly – as requested in the interrogatory – to the headings previously employed in DFC/USPS-11. Accordingly, the interpretation of the five column headings in DBP-USPS-105 should be “Percent Delivered Within 1 Day,” “Percent Delivered Within 2 Days,” “Percent Delivered Within 3 Days,” “Percent Delivered Within 4 Days,” and “Percent Delivered In 5 Or More Days.” The latter column cannot equal 100.00 if any of the four previous columns exceeds 0.00. However, since the first four columns show a cumulative tally while the fifth column does not, the fourth and fifth columns should add to 100.00.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-175. Please refer to your response to DBP/USPS-105.

[a] Do the days along the top of the chart represent calendar days or do they represent days that take into account non-delivery days [for example mail sent on a Saturday and delivered on the following Monday will be tallied as one day].

[b] If the former, please explain the type of mail that has a 3-day delivery standard but is able to be delivered in one calendar day. If the latter, please confirm, or explain if you are unable to confirm, that most of this mail is mail that is sent on a Saturday to the 3-day area and is delivered on Monday.

RESPONSE:

[a] The latter.

[b] Unable to confirm as written. "This mail" presumably refers to the example of a mail piece mailed on a Saturday and delivered on a Monday. While this will be tallied as one-day delivery, it does not extend over "one calendar day" as premised in the example.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-176. Please refer to your response to DFC/USPS-74. Since many of the percent of total volume entries for the upper weights are shown as 0.00, please provide a revised chart for all values that for 0.02 or less are shown to at least three decimal places [for those that are 0.002 or less please show to four decimal places, etc.]

RESPONSE:

Attached is an xls spreadsheet containing the underlying volume distribution key from which the original percentage distribution has been derived. This data will allow a person to compute percentage changes to any desired decimal point.

POUND INCREMENT	OUNCE INCREMENT	ESTIMATED VOLUME
		1 1,930,111
		2 3,262,498
		3 3,021,889
		4 2,663,629
		5 2,260,791
		6 1,936,044
		7 1,780,334
		8 1,935,405
		9 1,701,832
		10 1,767,785
		11 1,895,674
		12 1,790,747
		13 2,588,161
		14 12,001,609
		15 10,711,840
		16 9,552,871
	2	60,015,354
	3	15,375,754
	4	6,065,840
	5	3,048,150
	6	1,644,176
	7	964,412
	8	585,459
	9	411,793
	10	240,773
	11	186,471
	12	137,948
	13	116,866
	14	73,199
	15	62,696
	16	55,799
	17	55,558
	18	44,129
	19	47,077
	20	40,191
	21	49,325
	22	48,403
	23	25,079
	24	12,861
	25	6,936
	26	11,650
	27	16,623
	28	7,649
	29	11,385
	30	6,795
	31	11,143

32	5,516
33	6,063
34	6,529
35	5,853
36	6,343
37	5,806
38	6,551
39	1,271
40	1,328
41	4,615
42	1,727
43	1,379
44	154
45	1,168
46	760
48	1,145
49	744
50	785
52	375
57	127
58	70
62	422
63	1,013
70	250

POUND INCREMENT	OUNCE INCREMENT	ESTIMATED VOLUME
		1 5,050,924
		2 7,247,911
		3 5,060,872
		4 4,629,647
		5 4,485,029
		6 4,032,949
		7 3,594,465
		8 3,814,625
		9 3,655,327
		10 3,662,933
		11 3,467,719
		12 3,285,387
		13 4,031,063
		14 10,728,319
		15 10,044,353
		16 9,088,006
	2	71,601,331
	3	24,850,938
	4	11,139,367
	5	6,064,894
	6	3,655,424
	7	2,334,194
	8	1,402,653
	9	1,025,736
	10	698,473
	11	501,765
	12	410,594
	13	317,046
	14	241,262
	15	170,476
	16	147,390
	17	107,952
	18	105,407
	19	105,793
	20	81,010
	21	79,130
	22	68,868
	23	46,667
	24	41,357
	25	40,596
	26	32,346
	27	30,155
	28	14,832
	29	25,973
	30	15,213
	31	14,708

32	17,027
33	13,740
34	11,590
35	13,208
36	13,155
37	10,324
38	8,556
39	7,628
40	6,274
41	5,042
42	1,985
43	6,366
44	4,815
45	1,871
46	4,088
47	3,003
48	993
49	368
50	257
51	75
52	167
53	2,693
55	500
56	1,004
57	1,528
58	125
59	770
60	475
61	398
65	475
66	725
69	510

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.

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