

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

FURTHER RESPONSE OF POSTAL SERVICE WITNESS LEWIS
TO ORAL REQUEST FROM VALPAK
(August 4, 2005)

The United States Postal Service hereby provides a further response of witness Lewis to an oral request from Valpak posed at the July 7 hearing on his testimony. To the extent that the previous response, filed on July 19, was essentially a status report on procuring the requested information contained in this response, this response supercedes the July 19 response.

The question is paraphrased and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 4, 2005

**FURTHER RESPONSE OF POSTAL SERVICE WITNESS LEWIS
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Q. Tr. 6/2413-15. Please provide an estimate of the number or percentage of delivery points for all routes or any section of routes where the carrier is restricted in the number of bundles that can be carried.

RESPONSE:

Below I have provided two tables of data from the Address Management System and an analysis that illustrates the cross-examination discussion that led to the ValPak information request cited above.

The table titled POSSIBLE DELIVERIES BY TYPE OF DELIVERY shows City deliveries classified by type. Carriers are not constrained to three bundles when delivering to curblines, cluster boxes, centralized, and dismount delivery points. The Address Management System does not provide a count of dismount deliveries. The 'Other' category includes all delivery types that are not curblines, cluster boxes, or centralized. The table shows that only 44.3% of city deliveries are other than curblines, cluster boxes, or centralized. Therefore, the actual number of deliveries affected by the three-bundle restriction is something less than 44.3% because the 'Other' category includes a type of delivery, 'dismount,' that is not constrained.

Possible Deliveries by Type of Delivery

	2002	%	2003	%	2004	%	2005	%
Curblines	19,217,974	22.8	19,448,992	23.0	19,652,058	23.1	19,806,178	23.1
Cluster Box	9,133,797	10.8	9,425,431	11.1	9,682,836	11.4	9,917,759	11.6
Centralized	17,425,332	20.7	17,672,036	20.9	17,843,557	20.9	17,995,141	21.0
Other	38,434,434	45.6	38,196,763	45.1	38,028,351	44.6	37,920,269	44.3

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**Routes by Route
Category**

	2002	%	2003	%	2004	%	2005	%
Curbline	38,982	23.5	38,677	23.4	38,696	23.5	38,804	23.6
Dismount	25,549	15.4	25,372	15.4	25,440	15.5	25,642	15.6
Other	799	0.5	875	0.5	1,020	0.6	847	0.5
Foot	12,148	7.3	11,786	7.1	11,470	7.0	11,158	6.8
Park/Loop	88,421	53.3	88,265	53.5	87,825	53.4	87,917	53.5

**Bundle Restriction Based upon Routes versus Based upon
PDs**

	2002	2003	2004	2005
% Difference	15.0	15.6	15.7	16.0

I have included the ROUTES BY ROUTE CATEGORY table to illustrate that assuming that 'Foot' and 'Park and Loop' routes are unable to take more than three bundles of mail to the street and then estimating the impact of the three-bundle work rule by relying on categories of routes, rather than types of delivery points, results in an overstatement of the impact of the work rule. (In the table titled BUNDLE RESTRICTION BASED UPON ROUTES VERSUS BASED UPON PDs, the percent difference for each year is the sum of the percentages for Foot and Park/Loop in the second table, minus the percentage for Other in the first table.)

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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