

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

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OCA/USPS-112 [ERRATA]
(September 9, 2005)

The United States Postal Service hereby files a revised response to interrogatory OCA/USPS-112. The original response was filed on June 17, 2005. The revised response leaves the original answers to subparts (a) through (c) intact, but replaces the original response to subpart (d) with a Table containing the requested data. The revised response to OCA/USPS-112 filed today supersedes the original response in its entirety. The interrogatory is stated verbatim and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998, Fax -5402
michael.t.tidwell@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY**

Revised; September 9, 2005

OCA/USPS-112

Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, and Exhibit 2-2., "First-Class Mail Service Standard Improvement," at page 27.

- a. Please refer to the row "PQ 2 -00," column "3-Day Service." Please confirm that the entry 683,218 should equal 683,153 (849,043 - 8,744 - 157,081). If you do not confirm, please explain. If you do confirm, please explain the cause of the discrepancy between Exhibit 2-2 and your answer.
- b. Refer to the row "Change +/-," column "Total Pairs." Please show the distribution of the 1,844 3-digit ZIP Code pairs to the 1-day service, 2-day service, and 3-day service columns.
- c. For the period PQ 2 2000 to PQ 2 2003, please provide the number of 3-digit ZIP Code pairs that:
 - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
 - ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
 - iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.
- d. For the period PQ 2 2000 to PQ 2 2003, please provide the percentage of First-Class Mail volume associated with the 3-digit ZIP Code pairs that:
 - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
 - ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
 - iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

RESPONSE:

- a. Not confirmed. When the data were provided for inclusion in the Strategic Plan, the 3-Day total of 683,281 had the final two digits transposed to incorrectly read "683,218". That typographical error accounts for the discrepancy in Exhibit 2-2 of the Strategic Plan.
- b. N/A

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY**

Revised; September 9, 2005

RESPONSE to OCA/USPS-112 (continued):

- c. i. upgraded from 3-day to 2-day: 49,262; upgraded from 2-day to 1-day: 16.
- ii. upgraded from 2-day to 1-day: 35; downgraded from 2-day to 3- day:
26,889.
- iii. downgraded from 1-day to 2-day: 33; downgraded from 1-day to 3- day:
3.
- d. i-iii. See the table below.

Q2 FY 2000 Service Standard	Q2 FY 2003 Service Standard	% of Q2 FY 2000 First-Class Volume Under Indicated Standard	% of Q2 FY 2003 First-Class Volume Under Indicated Standard
1	2	0.00606%	0.01092%
1	3	0.00027%	0.00013%
2	1	0.02337%	0.02279%
2	3	4.22006%	3.84394%
3	1	0.00001%	0.00000%
3	2	2.11595%	2.18702%