

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 OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY OCA/USPS-114
[ERRATA]

The United States Postal Service hereby provides a revised response to the following interrogatory: OCA/USPS-114. The original response was filed on June 15, 2005. The revised response replaces the final sentence in the original answers to subparts (b), (e), (f) and (h). There are no other changes.

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 -5024
michael.t.tidwell@usps.gov
September 20, 2005

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY
Revised: September 20, 2005**

OCA/USPS-114

Please refer to the response to USPS-LR-K-117, "First-Class Mail Service Standard Changes."

- a. For PQ 4 of 2002, please confirm that the Postal Service upgraded 40 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service. If you do not confirm, please explain.
- b. For PQ 4 of 2002, please provide the percentage of First-Class Mail volume associated with the 40 3-digit ZIP Code pairs that were upgraded.
- c. During FY 2002, did the Postal Service upgrade or downgrade any other First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these upgraded and downgraded 3-digit ZIP Code pairs.
- d. For PQ 1 of 2003, please confirm that the Postal Service upgraded 106 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service, and downgraded 90 ZIP Code pairs from 2-day service standard to 3-day service standard. If you do not confirm, please explain.
- e. For PQ 1 of 2003, please provide the percentage of First-Class Mail volume associated with the 106 3-digit ZIP Code pairs that were upgraded, and the 90 3-digit ZIP Code pairs that were downgraded.
- f. During FY 2004, did the Postal Service upgrade or downgrade any First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these 3-digit ZIP Code pairs.
- g. For PQ 2 of 2005, please confirm that the Postal Service upgraded 20 First-Class Mail 3-digit ZIP Code pairs from 2-day service standard to 1-day service, and downgraded 9 ZIP Code pairs from 1-day service standard to 2-day service standard. If you do not confirm, please explain.
- h. For PQ 2 of 2005, please provide the percentage of First-Class Mail volume associated with the 20 3-digit ZIP Code pairs that were upgraded, and the 9 3-digit ZIP Code pairs that were downgraded.

RESPONSE:

- a. Confirmed.
- b. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY
Revised: September 20, 2005**

RESPONSE to OCA/USPS-114 (continued):

- the 40 3-digit ZIP Code pairs referenced in subpart (a) during FY 02, Quarter 4. That percentage is 0.027.
- c. Because of the data archiving problems described in response to DBP/USPS-4, the Postal Service is unable to respond here beyond the scope indicated in response to that interrogatory, meaning that it will only be able to provide the Quarter 4 data in response to subpart (b).
- d. Confirmed.
- e. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 106 upgraded and the 90 downgraded 3-digit ZIP Code pairs referenced in subpart (d) during FY 03, Quarter 1. That percentage is 0.008.
- f. As indicated in Library Reference K-117, there were 20 First-Class Mail upgrades and 197 downgrades made during FY 04, Quarter 4. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 20 upgraded and the 197 downgraded 3-digit ZIP Code pairs referenced in subpart (e) during FY 03, Quarter 1. That percentage is 0.006.
- g. Confirmed.
- h. The Postal Service interprets the question as seeking total originating and total destinating First-Class Mail volumes estimated by ODIS to travel between the 20

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY
Revised: September 20, 2005**

RESPONSE to OCA/USPS-114 (continued):

3-digit ZIP Code upgraded pairs and the 9 downgraded pairs referenced in subpart (g) during FY 05, Quarter 2. That percentage is 0.013.