

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
ANTHONY M. PAJUNAS (USPS-T-45) TO INTERROGATORIES OF DOUGLAS F.
CARLSON (DFC/USPS-T45-1-7)
(June 23, 2006)

The United States Postal Service hereby provides the responses of witness
Anthony M. Pajunas (USPS-T-45) to the following interrogatories of Douglas F. Carlson,
filed on June 9, 2006:

DFC/USPS-T45-1-7

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFCP/USPS-T45-1. Please confirm that the FedEx night-turn network carries Express Mail on flights that already existed to carry FedEx cargo and that continue to exist to carry FedEx cargo.

RESPONSE:

I cannot confirm your interrogatory because that information is not available to the Postal Service.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFCP/USPS-T45-2. Please identify the types of Express Mail — e.g., Express Mail guaranteed for delivery in one day, two days, three days, or four days—that are transported on the FedEx night-turn network.

RESPONSE:

Express Mail of all relevant service standards can be transported on the FedEx Night-turn network.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFCP/USPS-T45-3. Please explain why some Express Mail is transported on commercial passenger aircraft, and please describe the characteristics of this mail.

RESPONSE:

Some Express Mail is transported on commercial passenger aircraft because some FedEx dispatches are too early for us to make the connection. Additionally, FedEx does not operate on Saturday or Sunday evening and we accept Express Mail on both days. The Express Mail product that flies on commercial passenger aircraft has the same characteristics as other Express Mail pieces.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T45-4. Please explain whether the FedEx day-turn network carries mail on flights that already existed to carry FedEx cargo and that continue to exist to carry FedEx cargo.

RESPONSE:

That information is not available to the Postal Service.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T45-5. Please describe the extent to which mail transported on the FedEx day-turn network and night-turn network and that must travel from Point A to Point B is flown through FedEx's Memphis hub.

RESPONSE:

The Postal Service does not track this data. Mail that travels on the FedEx network can travel on direct point-to-point transportation, or transfer through Indianapolis, Newark, Alliance (Dallas), or Memphis.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T45-6. Please identify the approximate percentage or proportion of the volume of Express Mail, Priority Mail, and First-Class Mail that is flown that travels on each FedEx network.

RESPONSE:

During 3 random weeks selected in April and May of 06 (which I have no reason to doubt are representative weeks), the Day-turn network volume consisted of approximately 79% Priority Mail, 20% First-Class Mail, and less than 1% Express Mail, when measured on a cubic foot basis.

During the same three weeks the Night-turn network consisted of approximately 3% First-Class Mail and 97% Express Mail, when measured in pounds.

RESPONSE OF USPS WITNESS PAJUNAS (USPS-T-45) TO
INTERROGATORY OF DOUGLAS F. CARLSON

DFC/USPS-T45-7. Please describe the characteristics of mail that is flown that is not or cannot be flown on commercial passenger aircraft.

RESPONSE:

In general, Priority Mail is transported on cargo networks, as much of it cannot be transported on commercial passenger aircraft.

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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