

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SHARKEY TO INTERROGATORIES OF
DAVID B. POPKIN
REDIRECTED FROM WITNESS USPS
(DBP/USPS-T8R, 11AB, 12AB)

Pursuant to Presiding Officer's Ruling No. R97-1/53, the United States Postal Service hereby provides responses of witness Sharkey to the following interrogatories of David B. Popkin: DBP/USPS-T8r, 11ab, 12ab, filed on September 8, 1997, and redirected from witness USPS.

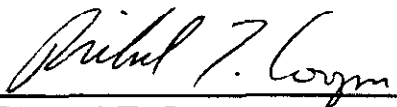
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

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November 4, 1997

Response of Postal Service Witness Sharkey to Interrogatories of David B. Popkin

DPB/USPS-8[r]: [Referring to the mail processing of Priority Mail as distinct from the processing systems for "Letters and Sealed Parcels" and "Cards":] If so, please explain the details of the system and the differences between it and the system used for other subclasses of mail.

Response:

For a description of First Class mail processing see the testimony of Postal Service witness Pajunas in Docket No. MC95-1 (USPS-T-2). See, for example, section 4 which describes the processing of nonautomation compatible letters and section 7 which describes the processing of nonbarcoded flat mail.

For a description of Priority Mail Processing see witness Sharkey's response to UPS/USPS-T33-1 and witness Moden's responses to UPS/USPS-T4-6, 31 and 32.

Response of Postal Service Witness Sharkey to Interrogatories of David B. Popkin

DBP/USPS-11 Furthermore, with respect to Express Mail Service Commitments performance goals,

- [a] describe the method that is utilized to establish the extent of the overnight delivery area.
- [b] To what extent are cutoff times made which are earlier than the closing time for window hours at a given office?

Response:

- [a] An analysis is made of available transportation from originating areas to determine overnight delivery areas from originating areas.
- [b] At some post offices Express Mail addressed to certain destination ZIP Codes may have a cutoff time which is earlier than the post office's window closing time in order to meet the best possible delivery commitment to the destination. I do not know the exact extent to which this occurs.

Response of Postal Service Witness Sharkey to Interrogatories of David B. Popkin

DBP/USPS-12 Furthermore, with respect to Express Mail Service Commitments/performance goals

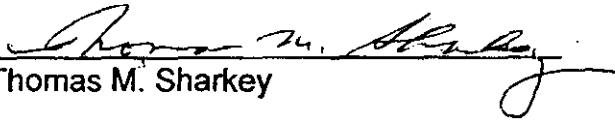
- [a] Will Express Mail be delivered as expeditiously as possible or will it be delivered by the regular carrier so long as it will meet the established delivery time?
- [b] Provide copies of all regulations which describe the method of delivery to be utilized.

Response:

- [a] Express Mail is delivered by the regular carrier as long as the commitment for the Express Mail can be met.
- [b] To my knowledge there are no regulations governing this type of delivery.

DECLARATION

I, Thomas M. Sharkey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

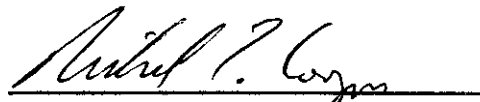

Thomas M. Sharkey

Dated: _____

11-4-97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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