

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-T45-8, 9(a), 10(a))
(July 24, 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 July 10, 2006:

DFC/USPS-T45-8, 9(a), and 10(a)

An objection to DFC/USPS-T45-9(b) was filed on July 20, 2006. DFC/USPS-T45-10(b) is being redirected to the Postal Service for an institutional response. Each answered 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

DFC/USPS-T45-8. Please refer to your response to DFC/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 *actually are* transported on the FedEx night-turn network.

RESPONSE:

Next Day Express Mail and Second Day Second Day Express Mail, which includes Express Mail guaranteed for delivery on the second delivery day, are transported on the Fed-Ex night-turn.

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DFC/USPS-T45-9. Please refer to your response to DFC/USPS-T45-3.

a. Please confirm that Express Mail that is accepted on a Saturday or Sunday for Next Day delivery and that is transported by air is transported on commercial passenger aircraft. If you do not confirm, please explain.

b. Please explain whether Express Mail that is accepted on a Saturday or Sunday for Next Day delivery, that is transported by air, and that weighs more than 16 ounces is transported on commercial passenger aircraft.

RESPONSE:

a. Generally that is a true statement, but there are some exceptions, such as when it might fly on the C-Net.

b. Objection filed.

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DFC/USPS-T45-10. Please refer to your response to DFC/USPS-T45-6.

a. Please confirm that you provided the percent of the volume on each FedEx network that consists of Priority Mail, Express Mail, and First-Class Mail.

b. As DFC/USPS-T45-6 requested, 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:

a. Confirmed that for Day-turn network volume, I provided the percentages of Priority Mail, First-Class Mail, and Express Mail (including International Express Mail), when measured on a cubic foot basis, flying on the network. For Night-turn network volume, I provided the percentages of Priority Mail, First-Class Mail, and Express Mail (including International Express Mail), when measured in pounds, flying on the network.

b. Redirected to the Postal Service for an institutional response.

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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