

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

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POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

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Docket No. R2005-1

INSTITUTIONAL RESPONSES OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS MAYES  
(APWU/USPS-T25-2-3)

The United States Postal Service hereby files its responses to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, filed on June 10, 2005 and redirected from witness Mayes.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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June 24, 2005

RESPONSE OF UNITED STATES POSTAL SERVICE TO THE INTERROGATORIES  
OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO, REDIRECTED FROM  
WITNESS MAYES

**APWU/USPS-T25-2** Does the Postal Service have information or does it make an estimate about where mail that is currently being dropshipped would have entered the system if dropship discounts were not in place? If so, please describe the source of the information, describe the information, and state what estimates are made about where mail would have been shipped if there were no dropshipping discount.

**Response:**

No.

RESPONSE OF UNITED STATES POSTAL SERVICE TO THE INTERROGATORIES  
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**APWU/USPS-T25-3** Before dropship discounts for Standard A mail were introduced, what percentage of Standard A mail was dropshipped at the destinating delivery unit? What percentage of Standard A mail was dropshipped at the destinating BMC? What percentage of Standard A mail was dropshipped at the destinating SCF?

**Response:**

The entry profile for Third-Class Mail as presented in Appendix A15-1 of USPS-LR-F-199 in Docket No. R90-1 provided estimated volumes of Third-Class Mail entered at the Destination Delivery Office, Destination SCF and Destination BMC. Comparing those estimated destination entered volumes to the FY 1988 Third-Class Mail volumes reveals that an estimated 0.6% of total Third-Class Mail was entered at the Destination Delivery Office, 1.03% was entered at the Destination SCF, and 0.08% was entered at the Destination BMC.

## **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.

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June 24, 2005