

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF POSTCOM (POSTCOM/USPS-T7-8, 11 - 12, 18),
REDIRECTED FROM WITNESS THRESS
(July 21, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of Postcom, filed on July 7, 2006: POSTCOM/USPS-T7-8, 11 - 12, 18, redirected from witness Thress.

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

Eric P. Koetting

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Washington, D.C. 20260-1137
(202) 268-2992, FAX -5402
July 21, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF POSTCOM,
REDIRECTED FROM WITNESS THRESS**

POSTCOM/USPS-T7-8.

Please produce quarterly volume data for Library/Media Mail in pieces by weight (in ounces or weight in pounds including decimals rounded to the tenth of a pound) in all available years after 1970. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 – 66, please describe its location within the files.

RESPONSE:

No such data series is available.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF POSTCOM,
REDIRECTED FROM WITNESS THRESS**

POSTCOM/USPS-T7-11.

Please produce quarterly prices of Standard Parcels in all available years after 1970, determined using the same methodology as the price of Standard Regular mail that underlies the results presented in Table 24 of USPS-T-7. Please deliver the data in the requested Data Format with an accompanying Data Dictionary (as defined above). If this data in the requested Data Format is already available in library references LR-L-63 – 66, please describe its location within the files.

RESPONSE:

No such data series is available.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF POSTCOM,
REDIRECTED FROM WITNESS THRESS**

POSTCOM/USPS-T7-12.

Please produce quarterly volume data for Standard Parcels in pieces in all available years after 1970. If this data is not available, please provide an estimated quarterly percentage of mail shapes, including parcels, in each Standard Mail subclass. Please deliver the data in the requested Data Format with an accompanying Data Dictionary. If data in the requested Data Format is already available in library references LR-L-63 – 66, please describe its location within the files.

RESPONSE:

The information that is available is presented in the attached Excel file. One point to be aware of when reviewing these data is that the Standard parcel surcharge went into effect in January of 1999 (Q2 of FY 1999). Any change in reported parcels around that time may be a result of an actual change in the number of parcels, a change in reporting practices, some combination of those factors, or perhaps something else. Additionally, it should be noted that the definition of a quarter changed in 2004. Prior to 2004, the data are in the old Postal Quarter system, with 13 AP's and Q4 with 4 AP's.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF POSTCOM,
REDIRECTED FROM WITNESS THRESS**

POSTCOM/USPS-T7-18.

Please produce quarterly data regarding the percentage of volumes of Media Mail that would have been eligible for BPM rates in all available years after 1970. Please deliver this data in the requested Data Format with an accompanying Data Dictionary. If this data in the requested Data Format is already available in library references LR-L-63 – 66, please describe its location within the files.

RESPONSE:

No such data series is available.

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.

Eric P. Koetting

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