

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 INTERROGATORY OF DAVID POPKIN
(DBP/USPS-568)
(September 12, 2006)

The United States Postal Service hereby provides its institutional response to the DBP/USPS-568, filed on August 28, 2006.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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DBP/USPS-568 Please refer to your response to Interrogatory DBP/USPS-475. The original APWU Interrogatory and response is as follows:

APWU/USPS-T32-10 On page 13 of your testimony you state that a “significant percentage” of single piece letters have handwritten addresses. How many letters in the test year had handwritten addresses? What percentage of handwritten letters are automation compatible?

RESPONSE

We do not have the data on the number of single-piece letters with handwritten addresses.

The Postal Service stated that they do not have data on the number of single-piece letters that have hand-written addresses.

[a] Please confirm, or explain if you are unable to confirm, that a number of the EXFC single-piece letter categories have handwritten addresses.

[b] Please confirm, or explain if you are unable to confirm, that the various percentages utilized in the EXFC Program have been designed to match that which occurs in the overall mail stream.

[c] Please explain why the response to the first question asked in Interrogatory APWU/USPS-T32-10 could not have been given as the sum of the percentages of EXFC categories that utilize hand-written addresses multiplied by the total mail volume to obtain the number of pieces with hand-written addresses.

RESPONSE

- (a) Confirmed.
- (b) Since no exact match is possible, not confirmed. However, EXFC pieces are intended to reflect the range of possible mailpiece characteristics, including handwritten addresses.
- (c) The Postal Service had no basis for projecting the volume of handwritten pieces **in the test year**, as requested. Accordingly, the Postal Service responded as it did.