

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

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POSTAL SERVICE  
OFFICE OF THE COMMISSIONER

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESSES PAFFORD AND  
HUNTER TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17  
(August 3, 2000)

The United States Postal Service hereby provides the timely responses of witnesses Pafford and Hunter to Presiding Officer's Information Request No. 17. Respective questions are repeated, followed by the responses, as appropriate, from witness Pafford or Hunter. A single declaration from each witness is appended at the end, with respective responsibility for each question determinable from the question headers.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



\_\_\_\_\_  
Kenneth N. Hollies

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

1. Please provide Tables 1, 2, and 3 in the testimony of witness Pafford (USPS-T-4) updated for FY 1999.

**RESPONSE:**

The attached tables provide FY 1999 RPW Report estimates and their estimated confidence intervals.

**TABLE 1**  
**FISCAL YEAR 1999 REVENUE ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 4/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS 2/	22,125,219	0.33	21,982,113	22,268,325
NONAUTO PRESORT LETTERS, FLATS, AND IPPS 1/	1,427,671	1.92	1,373,945	1,481,397
AUTO PRESORT LETTERS AND FLATS 1/	9,923,051	0.20	9,884,153	9,961,949
AUTO CARRIER ROUTE PRESORT LETTERS 1/	309,063	0.79	304,277	313,849
SINGLE-PIECE CARDS 2/	585,898	1.77	565,572	606,224
NONAUTO PRESORT MAILING CARDS 1/	91,862	9.78	74,253	109,471
AUTO PRESORT CARDS 1/	284,787	1.13	278,480	291,094
AUTO CARRIER ROUTE PRESORT CARDS 3/	15,332	1.41	14,908	15,756
DOMESTIC MAIL FEES 2/	170,357	2.42	162,277	178,437
TOTAL FIRST-CLASS	34,933,241	0.22	34,782,609	35,083,873
PRIORITY MAIL 1/	4,532,060	1.36	4,411,253	4,652,867
DOMESTIC MAIL FEES 2/	1,241	5.93	1,097	1,385
TOTAL PRIORITY 1/	4,533,301	1.36	4,412,461	4,654,141
EXPRESS MAIL	941,990	N/C 5/		
MAILGRAMS	1,608	N/C		
<b>PERIODICALS MAIL:</b>				
IN-COUNTY 3/	77,085	5.70	68,473	85,697
OUTSIDE COUNTY:				
REGULAR 3/	1,673,110	0.27	1,664,256	1,681,964
SPECIAL NONPROFIT 3/	331,308	1.55	321,243	341,373
CLASSROOM 3/	13,278	0.92	13,039	13,517
DOMESTIC MAIL FEES 2/	20,480	4.82	18,545	22,415
TOTAL PERIODICALS 1/	2,115,261	0.02	2,114,432	2,116,090
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE 2/	33,929	7.75	28,775	39,083
REGULAR - NONAUTO PRESORT 3/	1,821,166	1.22	1,777,618	1,864,714
REGULAR - AUTO PRESORT 3/	6,113,311	0.50	6,053,401	6,173,221
ENHANCED CARRIER ROUTE 3/	4,827,072	0.81	4,750,437	4,903,707
NONPROFIT - NONAUTO PRESORT 3/	519,593	0.90	510,427	528,759
NONPROFIT - AUTO PRESORT 3/	806,860	0.56	798,004	815,716
NONPROFIT ENHANCED CARRIER ROUTE 3/	227,878	1.74	220,106	235,650
DOMESTIC MAILING FEES 2/	85,960	1.23	83,888	88,032
TOTAL STANDARD MAIL (A) 1/	14,435,769	0.03	14,427,281	14,444,257
<b>STANDARD MAIL (B):</b>				
PARCEL POST 1/	1,020,873	0.88	1,003,265	1,038,481
BOUND PRINTED MATTER 1/	444,572	0.57	439,605	449,539
SPECIAL STANDARD 2/	314,127	3.73	291,162	337,092
LIBRARY MAIL 2/	46,521	2.68	44,077	48,965
DOMESTIC MAIL FEES 2/	2,366	6.38	2,070	2,662
TOTAL STANDARD MAIL (B) 1/	1,828,459	0.91	1,795,847	1,861,071

**TABLE 1**  
**(CONTINUED)**  
**FISCAL YEAR 1999 REVENUE ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 4/ OF ESTIMATE PERCENT 5/	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
U.S. POSTAL SERVICE MAIL				
FREE MAIL FOR THE BLIND AND HANDICAPPED				
TOTAL DOMESTIC MAIL	58,789,628	N/C		
TOTAL INTERNATIONAL MAIL	1,628,180	N/C		
TOTAL ALL MAIL	60,417,808	N/C		
SPECIAL AND OTHER SERVICES:				
REGISTERED 2/	95,245	0.03	95,189	95,301
INSURANCE 2/	91,476	2.53	86,940	96,012
COLLECT ON DELIVERY 2/	19,753	0.00	19,753	19,753
CERTIFIED 2/	377,303	4.05	347,353	407,253
DELIVERY RECEIPT SERVICES 2/	284,733	4.28	260,847	308,619
SPECIAL DELIVERY 2/	3	53.15	0	6
MONEY ORDERS	182,434	N/C		
SUBTOTAL	1,050,947	2.61	997,185	1,104,709
OUT. MONEY ORDERS TAKEN INTO REVENUE	45,861	N/C		
STAMPED ENVELOPES AND CARDS	30,666	N/C		
BOX RENTS	667,199	N/C		
	1,794,674	N/C		
TOTAL MAIL & SPECIAL SERVICES	62,212,482	N/C		
OTHER INCOME	599	N/C		
TOTAL INCOME	62,811,481	N/C		

1/ COMBINED DRPW AND BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

2/ DRPW (INCLUDES OTHER SOURCE DATA IF ANY)

3/ BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

4/ COEFFICIENT OF VARIATION = (100 x (EST. STD. ERROR / EST. REVENUE))

5/ NOT COMPUTED

6/ LOWER LIMIT - EST. REVENUE - (1.97 x EST. STD. ERROR)

UPPER LIMIT - EST. REVENUE + (1.97 x EST. STD. ERROR)

**TABLE 2**  
**FISCAL YEAR 1999 PIECES ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 4/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS 2/	53,783,619	0.53	53,224,915	54,342,323
NONAUTO PRESORT LETTERS, FLATS, AND IPPS 1/	4,180,253	2.16	4,003,278	4,357,228
AUTO PRESORT LETTERS AND FLATS 1/	37,422,893	0.21	37,268,860	37,576,926
AUTO CARRIER ROUTE PRESORT LETTERS 1/	1,255,973	0.80	1,236,279	1,275,667
SINGLE-PIECE CARDS 2/	2,850,770	1.78	2,751,312	2,950,228
NONAUTO PRESORT MAILING CARDS 1/	510,346	9.78	412,519	608,173
AUTO PRESORT CARDS 1/	1,823,598	1.13	1,783,209	1,863,987
AUTO CARRIER ROUTE PRESORT CARDS 3/	109,002	1.41	105,990	112,014
DOMESTIC MAIL FEES 2/				
TOTAL FIRST-CLASS 1/	101,936,455	0.29	101,357,048	102,515,862
PRIORITY MAIL 1/	1,189,469	1.27	1,159,861	1,219,077
DOMESTIC MAIL FEES 2/				
TOTAL PRIORITY 1/	1,189,469	1.27	1,159,861	1,219,077
EXPRESS MAIL	68,673	N/C 5/		
MAILGRAMS	4,087	N/C		
<b>PERIODICALS MAIL:</b>				
IN-COUNTY 3/	893,454	5.66	794,338	992,570
OUTSIDE COUNTY:				
REGULAR 3/	7,200,355	0.19	7,173,541	7,227,169
SPECIAL NONPROFIT 3/	2,120,463	2.11	2,032,769	2,208,157
CLASSROOM 3/	59,555	0.96	58,434	60,676
DOMESTIC MAIL FEES 2/				
TOTAL PERIODICALS 1/	10,273,827	0.43	10,187,239	10,360,415
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE 2/	42,037	9.80	33,963	50,111
REGULAR - NONAUTO PRESORT 3/	6,330,857	0.90	6,219,181	6,442,533
REGULAR - AUTO PRESORT 3/	32,665,408	0.50	32,345,287	32,985,529
ENHANCED CARRIER ROUTE 3/	32,755,982	0.95	32,146,066	33,365,898
NONPROFIT - NONAUTO PRESORT 3/	3,496,158	0.90	3,434,486	3,557,830
NONPROFIT - AUTO PRESORT 3/	7,453,438	0.56	7,371,629	7,535,247
NONPROFIT ENHANCED CARRIER ROUTE 3/	2,917,830	1.74	2,818,320	3,017,340
DOMESTIC MAILING FEES 2/				
TOTAL STANDARD MAIL (A) 1/	85,661,710	0.18	85,359,495	85,963,925
<b>STANDARD MAIL (B):</b>				
PARCEL POST 1/	318,982	0.83	313,793	324,171
BOUND PRINTED MATTER 1/	495,662	0.32	492,553	498,771
SPECIAL STANDARD 2/	200,404	5.02	180,686	220,122
LIBRARY MAIL 2/	28,077	2.93	26,465	29,689
DOMESTIC MAIL FEES 2/				
TOTAL STANDARD MAIL (B) 1/	1,043,126	1.05	1,021,658	1,064,594

**TABLE 2**  
**(CONTINUED)**  
**FISCAL YEAR 1999 PIECES ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 4/ OF ESTIMATE PERCENT 5/	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
U.S. POSTAL SERVICE MAIL	382,283	2.89	360,629	403,937
FREE MAIL FOR THE BLIND AND HANDICAPPED	53,227	5.74	47,239	59,215
TOTAL DOMESTIC MAIL	200,612,858	N/C		
TOTAL INTERNATIONAL MAIL	963,425	N/C		
TOTAL ALL MAIL	201,576,282	N/C		
<b>SPECIAL AND OTHER SERVICES:</b>				
REGISTERED 2/	13,699	0.08	13,678	13,720
INSURANCE 2/	48,610	2.29	46,428	50,792
COLLECT ON DELIVERY 2/	4,038	0.00	4,038	4,038
CERTIFIED 2/	268,054	4.11	246,461	289,647
DELIVERY RECEIPT SERVICES 2/	249,332	3.97	229,931	268,733
SPECIAL DELIVERY 2/	1	50.47	0	2
MONEY ORDERS	220,878	N/C		
SUBTOTAL	804,612	2.58	763,924	845,300
<b>USPS SPECIAL SERVICE TRANSACTIONS</b>				
REGISTERED TRANSACTIONS:	13,694	0.00	13,694	13,694
CERTIFIED TRANSACTIONS	1,545	19.65	950	2,140
RETURN RECEIPTS	1,319	29.28	562	2,076
SPECIAL DELIVERY TRANSACTIONS	0			
SPECIAL HANDLING TRANSACTIONS	62	23.76	33	91
TOTAL	16,620	3.51	15,477	17,763

1/ COMBINED DRPW AND BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

2/ DRPW (INCLUDES OTHER SOURCE DATA IF ANY)

3/ BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

4/ COEFFICIENT OF VARIATION = (100 x (EST. STD. ERROR / EST. PIECES))

5/ NOT COMPUTED

6/ LOWER LIMIT - EST. PIECES - (1.97 x EST. STD. ERROR)

UPPER LIMIT - EST. PIECES + (1.97 x EST. STD. ERROR)

**TABLE 3  
FISCAL YEAR 1999 WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. 4/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS 2/	2,641,888	0.49	2,616,515	2,667,261
NONAUTO PRESORT LETTERS, FLATS, AND IPPS 1/	175,684	1.54	170,381	180,987
AUTO PRESORT LETTERS AND FLATS 1/	1,399,360	0.21	1,393,600	1,405,120
AUTO CARRIER ROUTE PRESORT LETTERS 1/	45,416	0.97	44,553	46,279
SINGLE-PIECE CARDS 2/	17,825	1.78	17,203	18,447
NONAUTO PRESORT MAILING CARDS 1/	3,568	7.87	3,018	4,118
AUTO PRESORT CARDS 1/	15,315	1.10	14,985	15,645
AUTO CARRIER ROUTE PRESORT CARDS 3/	830	1.30	809	851
DOMESTIC MAIL FEES 2/				
TOTAL FIRST-CLASS 1/	4,299,885	0.32	4,272,916	4,326,854
PRIORITY MAIL 1/	2,142,570	1.55	2,077,479	2,207,661
DOMESTIC MAIL FEES 2/				
TOTAL PRIORITY 1/	2,142,570	1.55	2,077,479	2,207,661
EXPRESS MAIL	78,311	N/C 5/		
MAILGRAMS		N/C		
<b>PERIODICALS MAIL:</b>				
IN-COUNTY 3/	247,255	6.53	215,609	278,901
<b>OUTSIDE COUNTY:</b>				
REGULAR 3/	3,606,562	0.63	3,562,028	3,651,096
SPECIAL NONPROFIT 3/	595,513	1.16	581,973	609,053
CLASSROOM 3/	33,223	0.88	32,650	33,796
DOMESTIC MAIL FEES 2/				
TOTAL PERIODICALS 1/	4,482,553	0.44	4,443,895	4,521,211
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE 2/	7,316	7.35	6,262	8,370
REGULAR - NONAUTO PRESORT 3/	1,093,202	1.66	1,057,634	1,128,770
REGULAR - AUTO PRESORT 3/	3,744,879	0.51	3,707,445	3,782,313
ENHANCED CARRIER ROUTE 3/	4,861,825	1.07	4,759,863	4,963,787
NONPROFIT - NONAUTO PRESORT 3/	212,980	0.55	210,684	215,276
NONPROFIT - AUTO PRESORT 3/	511,310	0.58	505,497	517,123
NONPROFIT ENHANCED CARRIER ROUTE 3/	216,764	1.80	209,117	224,411
DOMESTIC MAILING FEES 2/				
TOTAL STANDARD MAIL (A) 1/	10,648,275	0.29	10,587,750	10,708,800
<b>STANDARD MAIL (B):</b>				
PARCEL POST 1/	1,936,972	0.82	1,905,841	1,968,103
BOUND PRINTED MATTER 1/	1,234,993	0.32	1,227,247	1,242,739
SPECIAL STANDARD 2/	309,918	2.98	291,816	328,020
LIBRARY MAIL 2/	51,284	3.16	48,108	54,460
DOMESTIC MAIL FEES 2/				
TOTAL STANDARD MAIL (B) 1/	3,533,167	0.60	3,491,617	3,574,717

**TABLE 3  
(CONTINUED)  
FISCAL YEAR 1999 WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. 4/ OF ESTIMATE PERCENT 5/	LOWER 95% CONFIDENCE LIMIT 6/	UPPER 95% CONFIDENCE LIMIT 6/
U.S. POSTAL SERVICE MAIL	102,574	3.43	95,678	109,470
FREE MAIL FOR THE BLIND AND HANDICAPPED	26,573	5.69	23,609	29,537
TOTAL DOMESTIC MAIL	25,313,908	N/C		
TOTAL INTERNATIONAL MAIL	244,891	N/C		
TOTAL ALL MAIL	25,558,800	N/C		

1/ COMBINED DRPW AND BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

2/ DRPW (INCLUDES OTHER SOURCE DATA IF ANY)

3/ BRPW (INCLUDES OTHER SOURCE DATA IF ANY)

4/ COEFFICIENT OF VARIATION =  $(100 \times (\text{EST. STD. ERROR} / \text{EST. WEIGHT}))$

5/ NOT COMPUTED

6/ LOWER LIMIT - EST. WEIGHT -  $(1.97 \times \text{EST. STD. ERROR})$

UPPER LIMIT - EST. WEIGHT +  $(1.97 \times \text{EST. STD. ERROR})$

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

2. Please provide Tables 1, 2, and 3 that are attached to the response to Interrogatory UPS/USPS-T4-6 updated for FY 1999.

**RESPONSE:**

The attached tables provide FY 1999 DRPW estimates and their estimated confidence intervals.

**TABLE 1**  
**FISCAL YEAR 1999 DRPW REVENUE ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 2/	UPPER 95% CONFIDENCE LIMIT 2/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS	22,062,599	0.33	21,919,898	22,205,300
NONAUTO PRESORT LETTERS, FLATS, AND IPPS	21,008	15.72	14,535	27,481
AUTO PRESORT LETTERS AND FLATS	92,581	13.68	67,757	117,405
AUTO CARRIER ROUTE PRESORT LETTERS	2,401	44.43	310	4,492
SINGLE-PIECE CARDS	585,262	1.77	564,958	605,566
NONAUTO PRESORT MAILING CARDS	337	75.11	0	833
AUTO PRESORT CARDS	40	73.44	0	98
AUTO CARRIER ROUTE PRESORT CARDS	8	91.06	0	22
DOMESTIC MAIL FEES	112,070	3.68	103,987	120,153
TOTAL FIRST-CLASS	22,876,306	0.31	22,737,310	23,015,302
<b>PRIORITY MAIL</b>				
PRIORITY MAIL	4,518,603	1.37	4,397,269	4,639,937
DOMESTIC MAIL FEES	1,241	5.93	1,097	1,385
TOTAL PRIORITY	4,519,844	1.37	4,398,477	4,641,211
<b>EXPRESS MAIL</b>				
EXPRESS MAIL	0			
<b>MAILGRAMS</b>				
MAILGRAMS	0			
<b>PERIODICALS MAIL:</b>				
IN-COUNTY	0			
OUTSIDE COUNTY:				
REGULAR	0			
SPECIAL NONPROFIT	0			
CLASSROOM	0			
DOMESTIC MAIL FEES	7,952	12.41	6,018	9,886
TOTAL PERIODICALS	7,952	12.41	6,018	9,886
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE	33,929	7.75	28,775	39,083
REGULAR - NONAUTO PRESORT	0			
REGULAR - AUTO PRESORT	0			
ENHANCED CARRIER ROUTE	0			
NONPROFIT - NONAUTO PRESORT	0			
NONPROFIT - AUTO PRESORT	0			
NONPROFIT ENHANCED CARRIER ROUTE	0			
DOMESTIC MAILING FEES	16,993	6.21	14,925	19,061
TOTAL STANDARD MAIL (A)	50,922	5.62	45,313	56,531
<b>STANDARD MAIL (B):</b>				
PARCEL POST	289,461	2.31	276,355	302,567
BOUND PRINTED MATTER	44,442	5.66	39,512	49,372
SPECIAL STANDARD	312,105	3.76	289,104	335,106
LIBRARY MAIL	46,521	2.68	44,077	48,965
DOMESTIC MAIL FEES	1,777	8.50	1,481	2,073
TOTAL STANDARD MAIL (B)	694,306	2.24	663,823	724,789

**TABLE 1  
(CONTINUED)  
FISCAL YEAR 1999 DRPW REVENUE ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 2/	UPPER 95% CONFIDENCE LIMIT 2/
U.S. POSTAL SERVICE MAIL				
FREE MAIL FOR THE BLIND AND HANDICAPPED				
TOTAL DOMESTIC MAIL	28,149,330	N/C 3/		
TOTAL INTERNATIONAL MAIL	42,662	N/C		
TOTAL ALL MAIL	28,191,992	N/C		
SPECIAL AND OTHER SERVICES:				
REGISTERED	130	22.93	72	188
INSURANCE	88,491	2.62	83,947	93,035
COLLECT ON DELIVERY	0			
CERTIFIED	377,303	4.05	347,353	407,253
DELIVERY RECEIPT SERVICES	284,733	4.28	260,847	308,619
SPECIAL DELIVERY	3	53.15	0	6
MONEY ORDERS	0			
SUBTOTAL	750,660	3.65	696,958	804,362
OUT. MONEY ORDERS TAKEN INTO REVENUE	0			
STAMPED ENVELOPES AND CARDS	3,090	N/C		
BOX RENTS	0			
TOTAL SPECIAL & OTHER SERVICES	753,750	N/C		
TOTAL MAIL & SPECIAL SERVICES	28,945,742	N/C		
OTHER INCOME	0			
TOTAL INCOME	28,945,742	N/C		

1/ COEFFICIENT OF VARIATION = (100 x EST. STD. ERROR / EST. REVENUE)

2/ LOWER LIMIT = EST. REVENUE - (1.97 x EST. STD. ERROR)

UPPER LIMIT = EST. REVENUE + (1.97 x EST. STD. ERROR)

3/ N/C - NOT COMPUTED

**TABLE 2  
FISCAL YEAR 1999 DRPW PIECES ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 2/	UPPER 95% CONFIDENCE LIMIT 2/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS	53,624,687	0.54	53,057,123	54,192,251
NONAUTO PRESORT LETTERS, FLATS, AND IPPS	55,946	15.25	39,224	72,668
AUTO PRESORT LETTERS AND FLATS	336,251	13.94	244,379	428,123
AUTO CARRIER ROUTE PRESORT LETTERS	9,812	45.34	1,092	18,532
SINGLE-PIECE CARDS	2,847,587	1.78	2,748,240	2,946,934
NONAUTO PRESORT MAILING CARDS	1,874	75.11	0	4,633
AUTO PRESORT CARDS	246	46.12	24	468
AUTO CARRIER ROUTE PRESORT CARDS	55	91.06	0	153
DOMESTIC MAIL FEES				
TOTAL FIRST-CLASS	56,876,458	0.50	56,319,069	57,433,847
<b>PRIORITY MAIL</b>				
DOMESTIC MAIL FEES				
TOTAL PRIORITY	1,186,806	1.28	1,157,031	1,216,581
<b>EXPRESS MAIL</b>				
	0			
<b>MAILGRAMS</b>				
	0			
<b>PERIODICALS MAIL:</b>				
IN-COUNTY	0			
OUTSIDE COUNTY:				
REGULAR	0			
SPECIAL NONPROFIT	0			
CLASSROOM	0			
DOMESTIC MAIL FEES				
TOTAL PERIODICALS	0			
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE	42,037	9.80	33,963	50,111
REGULAR - NONAUTO PRESORT	0			
REGULAR - AUTO PRESORT	0			
ENHANCED CARRIER ROUTE	0			
NONPROFIT - NONAUTO PRESORT	0			
NONPROFIT - AUTO PRESORT	0			
NONPROFIT ENHANCED CARRIER ROUTE	0			
DOMESTIC MAILING FEES				
TOTAL STANDARD MAIL (A)	42,037	9.80	33,963	50,111
<b>STANDARD MAIL (B):</b>				
PARCEL POST	62,629	2.20	59,928	65,330
BOUND PRINTED MATTER	27,010	5.94	23,865	30,155
SPECIAL STANDARD	199,376	5.05	179,642	219,110
LIBRARY MAIL	28,077	2.93	26,465	29,689
DOMESTIC MAIL FEES				
TOTAL STANDARD MAIL (B)	317,092	3.39	296,023	338,161

**TABLE 2  
(CONTINUED)  
FISCAL YEAR 1999 DRPW PIECES ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 2/	UPPER 95% CONFIDENCE LIMIT 2/
U.S. POSTAL SERVICE MAIL	381,060	2.89	359,475	402,645
FREE MAIL FOR THE BLIND AND HANDICAPPED	53,227	5.74	47,239	59,215
TOTAL DOMESTIC MAIL	58,856,680	N/C 3/		
TOTAL INTERNATIONAL MAIL	5,151	N/C		
TOTAL ALL MAIL	58,861,831	N/C		
<b>SPECIAL AND OTHER SERVICES:</b>				
REGISTERED	46	23.23	25	67
INSURANCE	47,046	2.36	44,870	49,222
COLLECT ON DELIVERY	0			
CERTIFIED	268,054	4.11	246,461	289,647
DELIVERY RECEIPT SERVICES	249,332	3.97	229,931	268,733
SPECIAL DELIVERY	1	50.47	0	2
MONEY ORDERS	0			
SUBTOTAL	564,479	3.68	523,764	605,194
<b>USPS SPECIAL SERVICE TRANSACTIONS</b>				
REGISTERED TRANSACTIONS:	0			
CERTIFIED TRANSACTIONS	1,545	19.65	950	2,140
RETURN RECEIPTS	1,319	29.28	562	2,076
SPECIAL DELIVERY TRANSACTIONS	0			
SPECIAL HANDLING TRANSACTIONS	62	23.76	33	91
TOTAL	2,926	19.96	1,781	4,071

1/ COEFFICIENT OF VARIATION = (100 x EST. STD. ERROR / EST. PIECES)

2/ LOWER LIMIT = EST. PIECES - (1.97 x EST. STD. ERROR)

UPPER LIMIT = EST. PIECES + (1.97 x EST. STD. ERROR)

3/ N/C - NOT COMPUTED

**TABLE 3  
FISCAL YEAR 1999 DRPW WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 2/	UPPER 95% CONFIDENCE LIMIT 2/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS	2,635,247	0.50	2,609,422	2,661,072
NONAUTO PRESORT LETTERS, FLATS, AND IPPS	2,883	16.79	1,934	3,832
AUTO PRESORT LETTERS AND FLATS	11,344	12.31	8,607	14,081
AUTO CARRIER ROUTE PRESORT LETTERS	357	46.72	30	684
SINGLE-PIECE CARDS	17,797	1.78	17,176	18,418
NONAUTO PRESORT MAILING CARDS	12	75.12	0	30
AUTO PRESORT CARDS	2	46.10	0	4
AUTO CARRIER ROUTE PRESORT CARDS	0			
DOMESTIC MAIL FEES				
TOTAL FIRST-CLASS	2,667,642	0.50	2,641,499	2,693,785
<b>PRIORITY MAIL</b>				
DOMESTIC MAIL FEES				
TOTAL PRIORITY	2,134,051	1.56	2,068,800	2,199,302
EXPRESS MAIL	0			
<b>MAILGRAMS</b>				
<b>PERIODICALS MAIL:</b>				
IN-COUNTY	0			
OUTSIDE COUNTY:				
REGULAR	0			
SPECIAL NONPROFIT	0			
CLASSROOM	0			
DOMESTIC MAIL FEES				
TOTAL PERIODICALS	0			
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE	7,316	7.35	6,262	8,370
REGULAR - NONAUTO PRESORT	0			
REGULAR - AUTO PRESORT	0			
ENHANCED CARRIER ROUTE	0			
NONPROFIT - NONAUTO PRESORT	0			
NONPROFIT - AUTO PRESORT	0			
NONPROFIT ENHANCED CARRIER ROUTE	0			
DOMESTIC MAILING FEES				
TOTAL STANDARD MAIL (A)	7,316	7.35	6,262	8,370
<b>STANDARD MAIL (B):</b>				
PARCEL POST	359,574	2.33	343,153	375,995
BOUND PRINTED MATTER	71,824	5.55	64,011	79,637
SPECIAL STANDARD	307,789	3.00	289,691	325,887
LIBRARY MAIL	51,284	3.16	48,108	54,460
DOMESTIC MAIL FEES				
TOTAL STANDARD MAIL (B)	790,471	2.07	758,400	822,542

**TABLE 3  
(CONTINUED)  
FISCAL YEAR 1999 DRPW WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. <sup>1/</sup> OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT <sup>2/</sup>	UPPER 95% CONFIDENCE LIMIT <sup>2/</sup>
U.S. POSTAL SERVICE MAIL	93,181	3.77	86,296	100,066
FREE MAIL FOR THE BLIND AND HANDICAPPED	26,573	5.69	23,609	29,537
TOTAL DOMESTIC MAIL	5,719,234	N/C <sup>3/</sup>		
TOTAL INTERNATIONAL MAIL	9,546	N/C		
TOTAL ALL MAIL	5,728,780	N/C		

<sup>1/</sup> COEFFICIENT OF VARIATION = (100 x EST. STD. ERROR / EST. WEIGHT)

<sup>2/</sup> LOWER LIMIT = EST. WEIGHT - (1.97 x EST. STD. ERROR)

UPPER LIMIT = EST. WEIGHT + (1.97 x EST. STD. ERROR)

<sup>3/</sup> N/C - NOT COMPUTED

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

3. Please provide Tables 1, 2, and 3 that are attached to the response to Interrogatory UPS/USPS-T5-2 updated for FY 1999.

**RESPONSE.** This information is provided in the attached Tables 1-3.

ATTACHMENT TO RESPONSE TO POIR NO. 17, QUESTION NO. 3

**TABLE 1**  
**FISCAL YEAR 1999 BRPW REVENUE ESTIMATES**  
**AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS				
NONAUTO PRESORT LETTERS, FLATS, AND IPPS	1,380,565	1.98	1,326,988	1,434,142
AUTO PRESORT LETTERS AND FLATS	9,675,768	0.16	9,645,425	9,706,111
AUTO CARRIER ROUTE PRESORT LETTERS	297,030	0.74	292,722	301,338
SINGLE-PIECE CARDS				
NONAUTO PRESORT MAILING CARDS	91,357	9.83	73,755	108,959
AUTO PRESORT CARDS	283,212	1.14	276,884	289,540
AUTO CARRIER ROUTE PRESORT CARDS	15,292	1.41	14,869	15,715
DOMESTIC MAIL FEES				
TOTAL FIRST-CLASS	11,743,224	0.23	11,690,286	11,796,162
PRIORITY MAIL				
DOMESTIC MAIL FEES	2,555	0.97	2,506	2,604
TOTAL PRIORITY	2,555	0.97	2,506	2,604
EXPRESS MAIL				
MAILGRAMS				
PERIODICALS MAIL:				
IN-COUNTY				
	77,085	5.7	68,473	85,697
OUTSIDE COUNTY:				
REGULAR	1,671,166	0.27	1,662,322	1,680,010
SPECIAL NONPROFIT	331,308	1.55	321,243	341,373
CLASSROOM	13,278	0.92	13,039	13,517
DOMESTIC MAIL FEES				
TOTAL PERIODICALS	2,092,837	0.02	2,092,017	2,093,657
STANDARD MAIL (A):				
SINGLE-PIECE				
REGULAR - NONAUTO PRESORT	1,810,616	1.23	1,766,966	1,854,266
REGULAR - AUTO PRESORT	6,096,472	0.5	6,036,727	6,156,217
ENHANCED CARRIER ROUTE	4,791,746	0.81	4,715,672	4,867,820
NONPROFIT - NONAUTO PRESORT	519,593	0.9	510,427	528,759
NONPROFIT - AUTO PRESORT	806,860	0.56	798,004	815,716
NONPROFIT ENHANCED CARRIER ROUTE	227,878	1.74	220,106	235,650
DOMESTIC MAILING FEES				
TOTAL STANDARD MAIL (A)	14,253,166	0.03	14,244,785	14,261,547
STANDARD MAIL (B):				
PARCEL POST	710,008	0.84	698,318	721,698
BOUND PRINTED MATTER	399,760	0	399,760	399,760
SPECIAL STANDARD				
LIBRARY MAIL				
DOMESTIC MAIL FEES				
TOTAL STANDARD MAIL (B)	1,109,768	0.53	1,098,240	1,121,296

**TABLE 1  
(CONTINUED)  
FISCAL YEAR 1999 BRPW REVENUE ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	REVENUE (\$1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
U.S. POSTAL SERVICE MAIL				
FREE MAIL FOR THE BLIND AND HANDICAPPED				
TOTAL DOMESTIC MAIL	29,201,550	N/C 2/		
TOTAL INTERNATIONAL MAIL				
TOTAL ALL MAIL	29,201,550	N/C		
SPECIAL AND OTHER SERVICES:				
REGISTERED				
INSURANCE				
COLLECT ON DELIVERY				
CERTIFIED				
RETURN RECEIPTS				
SPECIAL DELIVERY				
MONEY ORDERS				
SUBTOTAL				
OUT. MONEY ORDERS TAKEN INTO REVENUE				
STAMPED ENVELOPES				
BOX RENTS				
TOTAL MAIL & SPECIAL SERVICES	29,201,550	N/C		
OTHER INCOME				
TOTAL INCOME	29,201,550	N/C		

1/ COEFFICIENT OF VARIATION =  $100 \times (\text{EST. STD. ERROR} / \text{EST. REVENUE})$

2/ NOT COMPUTED

3/ LOWER LIMIT = EST. REVENUE -  $(1.97 \times \text{EST. STD. ERROR})$

UPPER LIMIT = EST. REVENUE +  $(1.97 \times \text{EST. STD. ERROR})$

**TABLE 2  
FISCAL YEAR 1999 BRPW PIECES ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS NONAUTO PRESORT LETTERS, FLATS, AND IPPS	4,042,470	2.23	3,865,782	4,219,158
AUTO PRESORT LETTERS AND FLATS	36,513,123	0.17	36,391,461	36,634,785
AUTO CARRIER ROUTE PRESORT LETTERS	1,205,357	0.75	1,187,638	1,223,076
<b>SINGLE-PIECE CARDS</b>				
NONAUTO PRESORT MAILING CARDS	507,538	9.83	409,752	605,324
AUTO PRESORT CARDS	1,813,448	1.13	1,773,284	1,853,612
AUTO CARRIER ROUTE PRESORT CARDS	108,722	1.41	105,717	111,727
<b>DOMESTIC MAIL FEES</b>				
TOTAL FIRST-CLASS	44,190,658	0.21	44,008,769	44,372,547
<b>PRIORITY MAIL</b>				
DOMESTIC MAIL FEES	857	0.98	841	873
TOTAL PRIORITY	857	0.98	841	873
<b>EXPRESS MAIL</b>				
<b>MAILGRAMS</b>				
<b>PERIODICALS MAIL:</b>				
IN-COUNTY	893,454	5.66	794,338	992,570
<b>OUTSIDE COUNTY:</b>				
REGULAR	7,193,869	0.19	7,167,079	7,220,659
SPECIAL NONPROFIT	2,120,463	2.11	2,032,769	2,208,157
CLASSROOM	59,555	0.96	58,434	60,676
<b>DOMESTIC MAIL FEES</b>				
TOTAL PERIODICALS	10,267,341	0.43	10,180,808	10,353,874
<b>STANDARD MAIL (A):</b>				
<b>SINGLE-PIECE</b>				
REGULAR - NONAUTO PRESORT	6,288,836	0.91	6,176,668	6,401,004
REGULAR - AUTO PRESORT	32,576,641	0.5	32,257,390	32,895,892
ENHANCED CARRIER ROUTE	32,511,591	0.96	31,899,853	33,123,329
NONPROFIT - NONAUTO PRESORT	3,496,158	1.01	3,426,948	3,565,368
NONPROFIT - AUTO PRESORT	7,453,438	0.54	7,374,551	7,532,325
NONPROFIT ENHANCED CARRIER ROUTE	2,917,830	1.99	2,804,023	3,031,637
<b>DOMESTIC MAILING FEES</b>				
TOTAL STANDARD MAIL (A)	85,244,494	0.19	84,927,044	85,561,944
<b>STANDARD MAIL (B):</b>				
PARCEL POST	253,061	0.89	248,647	257,475
BOUND PRINTED MATTER	468,368	0	468,368	468,368
<b>SPECIAL STANDARD</b>				
<b>LIBRARY MAIL</b>				
<b>DOMESTIC MAIL FEES</b>				
TOTAL STANDARD MAIL (B)	721,429	0.31	717,046	725,812

**TABLE 2  
(CONTINUED)  
FISCAL YEAR 1999 BRPW PIECES ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	PIECES (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
U.S. POSTAL SERVICE MAIL				
FREE MAIL FOR THE BLIND AND HANDICAPPED				
TOTAL DOMESTIC MAIL	140,424,779	N/C 2/		
TOTAL INTERNATIONAL MAIL				
TOTAL ALL MAIL	140,424,779	N/C		
SPECIAL AND OTHER SERVICES:				
REGISTERED				
INSURANCE				
COLLECT ON DELIVERY				
CERTIFIED				
RETURN RECEIPTS				
SPECIAL DELIVERY				
MONEY ORDERS				
SUBTOTAL				
USPS SPECIAL SERVICE TRANSACTIONS				
REGISTERED TRANSACTIONS:				
CERTIFIED TRANSACTIONS				
RETURN RECEIPTS				
SPECIAL DELIVERY TRANSACTIONS				
SPECIAL HANDLING TRANSACTIONS				
TOTAL				

1/ COEFFICIENT OF VARIATION =  $100 \times (\text{EST. STD. ERROR} / \text{EST. PIECES})$

2/ NOT COMPUTED

3/ LOWER LIMIT =  $\text{EST. PIECES} - (1.97 \times \text{EST. STD. ERROR})$

UPPER LIMIT =  $\text{EST. PIECES} + (1.97 \times \text{EST. STD. ERROR})$

ATTACHMENT TO RESPONSE TO POIR NO. 17, QUESTION NO. 3

**TABLE 3  
FISCAL YEAR 1999 BRPW WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
<b>FIRST-CLASS MAIL:</b>				
SINGLE-PIECE LETTERS, FLATS, AND IPPS				
NONAUTO PRESORT LETTERS, FLATS, AND IPPS	169,390	1.57	164,178	174,602
AUTO PRESORT LETTERS AND FLATS	1,370,726	0.19	1,365,621	1,375,831
AUTO CARRIER ROUTE PRESORT LETTERS	43,890	0.93	43,090	44,690
SINGLE-PIECE CARDS				
NONAUTO PRESORT MAILING CARDS	3,548	7.91	2,998	4,098
AUTO PRESORT CARDS	15,229	1.11	14,898	15,560
AUTO CARRIER ROUTE PRESORT CARDS	828	1.31	807	849
DOMESTIC MAIL FEES				
TOTAL FIRST-CLASS	1,603,612	0.19	1,597,640	1,609,584
<b>PRIORITY MAIL</b>				
DOMESTIC MAIL FEES	934	1	916	952
TOTAL PRIORITY	934	1	916	952
<b>EXPRESS MAIL</b>				
<b>MAILGRAMS</b>				
<b>PERIODICALS MAIL:</b>				
IN-COUNTY	247,255	6.53	215,609	278,901
OUTSIDE COUNTY:				
REGULAR	3,598,484	0.63	3,554,050	3,642,918
SPECIAL NONPROFIT	595,513	1.16	581,973	609,053
CLASSROOM	33,223	0.88	32,650	33,796
DOMESTIC MAIL FEES				
TOTAL PERIODICALS	4,474,475	0.44	4,435,887	4,513,063
<b>STANDARD MAIL (A):</b>				
SINGLE-PIECE				
REGULAR - NONAUTO PRESORT	1,090,036	1.67	1,054,357	1,125,715
REGULAR - AUTO PRESORT	3,738,048	0.51	3,700,682	3,775,414
ENHANCED CARRIER ROUTE	4,841,815	1.08	4,739,323	4,944,307
NONPROFIT - NONAUTO PRESORT	212,980	0.55	210,684	215,276
NONPROFIT - AUTO PRESORT	511,310	0.58	505,497	517,123
NONPROFIT ENHANCED CARRIER ROUTE	216,764	1.8	209,117	224,411
DOMESTIC MAILING FEES				
TOTAL STANDARD MAIL (A)	10,610,953	0.29	10,550,640	10,671,266
<b>STANDARD MAIL (B):</b>				
PARCEL POST	1,467,471	0.93	1,440,722	1,494,220
BOUND PRINTED MATTER	1,162,388	0	1,162,388	1,162,388
SPECIAL STANDARD				
LIBRARY MAIL				
DOMESTIC MAIL FEES				
TOTAL STANDARD MAIL (B)	2,629,859	0.52	2,603,055	2,656,663

**TABLE 3  
(CONTINUED)  
FISCAL YEAR 1999 BRPW WEIGHT ESTIMATES  
AND ASSOCIATED CONFIDENCE LIMITS**

SERVICE CATEGORY	WEIGHT (1,000s)	C.V. 1/ OF ESTIMATE PERCENT	LOWER 95% CONFIDENCE LIMIT 3/	UPPER 95% CONFIDENCE LIMIT 3/
U.S. POSTAL SERVICE MAIL				
FREE MAIL FOR THE BLIND AND HANDICAPPED				
TOTAL DOMESTIC MAIL	19,319,832	N/C 2/		
TOTAL INTERNATIONAL MAIL				
TOTAL ALL MAIL	19,319,832	N/C		

1/ COEFFICIENT OF VARIATION =  $100 \times (\text{EST. STD. ERROR} / \text{EST. WEIGHT})$

2/ NOT COMPUTED

3/ LOWER LIMIT = EST. WEIGHT - (1.97 x EST. STD. ERROR)

UPPER LIMIT = EST. WEIGHT + (1.97 x EST. STD. ERROR)

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

4. Please provide all revenue adjustment factors employed to adjust BRPW estimates for Parcel Post in FY 1999. Also specify the period for which each adjustment factor was applied.

**RESPONSE.** The revenue adjustment factors for permit imprint Parcel Post for FY 1999 are provided below.

PQ	Non-automated office blow-up	PFY-GFY Factor
1	1.00920754	0.76811594
2	1.00920754	-
3	1.06310	-
4	1.03489	1.18279570

Effective PQ3, FY 1999, a new trial balance account AIC 223 for permit imprint Parcel Post was established for use in the BRPW to adjust the PERMIT System distribution of revenue and volume to the known national revenue total. This account replaces the interim period trial balance adjustment factor of 1.00920754 constructed from the PQ2, FY 1997, census of permit imprint Parcel Post reporting offices. An office level factor F1 is also used in the BRPW as required to adjust any incomplete office data resulting from one or more missed AP's during a postal quarter. For the PQ2 period, the factor 1.5 was applied to the data from one office not reporting one of the three AP's, and the factor 3.0 was applied to one office not reporting two of the three 3 AP's. For the PQ3 period, the F1 factor 1.5 was applied to two offices and the 3.0 factor was applied to three offices. No F1 factors were required for the PQ 1 and PQ 4 periods and no other revenue adjustments are made to the FY 1999 data.

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

5. Please explain why a trial balance revenue adjustment is necessary for BRPW estimates.

**RESPONSE.** A trial balance can be a useful tool for improving the quality of BRPW results by controlling to known amounts of revenue. A BRPW estimate for a mail category is derived from a targeted panel comprised of automated revenue reporting offices supplemented if necessary with non-automated revenue reporting offices. However, a BRPW panel despite a normally high automated office coverage does not provide a census (i.e., 100 percent count) by itself. If a trial balance revenue account is available, it can serve as a control total for known revenue to which BRPW results can be tied. Revenue accounts by design do not provide, however, volume and weight information, nor do they provide the distribution of revenue among rate categories. As a result, the actual volume, weight and revenue (by rate category), unlike for the total revenue measure, cannot be known. For the trial balance controlled mail categories in the BRPW, the combined ratio estimator (of a total) takes advantage of the known revenue totals to correct the revenue estimate as well as to improve the volume estimates by exploiting the correlation between the revenue and volume, thereby reducing the sampling variance.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

6. Please provide DRPW-only volume, revenue, and weight estimates for the Parcel Post subclass in FY 1999 if the required data are available.

**RESPONSE:**

Beyond that which was provided in response to question 8 of POIR 17, these data are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

7. In FY 1999, the Postal Service retroactively adjusted reported FY 1998 Parcel Post volume and revenue by an increase of 50 million pieces and \$124 million (FY 1998 RPW, 11/5/98; FY 1999 RPW, 11/19/99). Please identify the mail categories, if any, that were adjusted to offset the increase in Parcel Post volume and revenue and show the magnitude of the adjustment for each of the mail categories.

**RESPONSE:**

The attached table compares the final FY 1998 RPW Report (issued 11/19/99) against the original (issued 11/5/98). The percent change column, identifies mail categories that were adjusted based on the introduction of Standard Mail (B) parcel post PERMIT System data and the utilization of mailing statement data for the nonautomated office component for precanceled stamp and metered RPW data for First-Class Presort and Standard Mail (A) (see footnotes to the final RPW report issued 11/19/99). It is therefore, not possible to isolate the changes in mail categories due strictly to the Parcel Post updates since other modifications occurred at the same time.

**REVENUE, PIECES, AND WEIGHT BY CLASSES OF MAIL AND SPECIAL SERVICES FOR GOVERNMENT FISCAL YEAR 1998**  
**GOVERNMENT FISCAL YEAR 1998 (Oct. 1, 1997-Sep. 30, 1998) COMPARED WITH GOVERNMENT FISCAL YEAR 1998**  
 (Agency and Franked Mail Distributed - Data in Thousands)

Service Category	1998 over 1998		1998 over 1998		1998 over 1998	
	Amount	Percent	Amount	Percent	Amount	Percent
<b>First-Class Mail: 2/</b>						
Single-Piece Letters, Flats, and IPPs	21,807,405	197.623	54,273,024	491.770	2,589,862	23.463
Nonautom. Presort Letters, Flats, & IPPs	1,542,425	(1.2)	4,658,236	(1.1)	188,724	(3.939)
Automation Presort Letters and Flats	9,035,064	(288.415)	34,696,924	(1,121.182)	1,285,947	(46.853)
Automation Carrier Route Presort Letters	305,949	(320.175)	1,279,092	(60.252)	46,628	(1.519)
Single-Piece Cards	612,924	607.316	2,971,751	2,944,565	18,579	170
Nonautomation Presort Cards	99,659	(2.1)	565,351	(11.689)	4,089	(31)
Automation Presort Cards	287,143	(2.145)	1,852,337	(13.579)	16,291	(114)
Automation Carrier Route Presort Cards	20,877	(45)	149,125	(325)	1,229	(3)
Domestic Mail Fees	149,740	148,848	892	0.6	-	-
Total First-Class Mail	39,861,187	(121.490)	100,434,151	(738.677)	4,151,345	(28.827)
Priority Mail	4,186,416	37.709	1,174,425	10.594	1,979,953	17.777
Domestic Mail Fees	941	933	-	-	-	-
Total Priority Mail	4,187,358	37.718	1,174,425	10.594	1,979,953	17.777
Express Mail	854,530	0.0	66,244	0.0	77,739	0.0
Mailgrams	1,678	0.0	4,302	0.0	-	-
<b>Periodicals:</b>						
In-County	79,302	(0.0)	923,865	(923.865)	253,938	(253.938)
Regular	1,643,645	1.643,644	7,195,166	7,195,006	3,580,405	3,580,405
Special Nonprofit	317,027	(0.0)	2,136,927	(2,136,927)	585,102	(585.102)
Classroom	12,229	(0.0)	60,793	(60.793)	31,684	(31.684)
Domestic Mail Fees	20,082	20,010	-	-	-	-
Total Periodical Mail	2,072,285	2,072,212	10,316,751	10,316,591	4,451,129	4,451,129
<b>Standard Mail (A): 2/</b>						
Single-Piece	123,859	122.722	150,276	148.990	28,032	27.775
Regular - Nonautomation Presort	1,927,930	(2.871)	6,992,941	(7.146)	1,182,083	(1.182,083)
Automation Presort	5,263,923	(27.948)	28,134,073	(163.108)	3,400,264	(3,400,264)
Enhanced Carrier Route	4,945,801	(6.829)	34,059,127	(51.377)	4,872,082	(4,872,082)
Nonprofit - Nonautomation Presort	486,447	(2.828)	3,719,254	(19.316)	239,983	(241.366)
Automation Presort	665,081	(11.461)	6,845,382	(6.962,580)	458,590	(458,590)
Nonprofit Enhanced Carrier Route	211,744	(8.19)	2,647,088	(9.750)	195,751	(195.751)
Domestic Mail Fees	76,958	76,822	-	-	-	-
Total Standard Mail (A)	13,701,742	(51.483)	82,508,141	(82.874,650)	10,376,784	(10,376,784)
<b>Standard Mail (B): 3/</b>						
Parcel Post	947,945	823.567	316,148	266,479	1,847,608	1,847,608
Bound Printed Matter	427,827	441	488,413	488,134	1,198,884	1,197,710
Special Standard Mail	330,301	327,286	189,946	174,747	308,191	305,387
Library Mail	45,684	42,688	27,475	253	53,105	52,621
Domestic Mail Fees	2,506	2,487	-	-	-	-
Total Standard Mail (B)	1,754,264	1,625,993	1,023,382	971,434	3,407,288	2,890,050
<b>Change</b>						
Government	21,807,405	197.623	54,273,024	491.770	2,589,862	23.463
Government	1,542,425	(1.2)	4,658,236	(1.1)	188,724	(3.939)
Government	9,035,064	(288.415)	34,696,924	(1,121.182)	1,285,947	(46.853)
Government	305,949	(320.175)	1,279,092	(60.252)	46,628	(1.519)
Government	612,924	607.316	2,971,751	2,944,565	18,579	170
Government	99,659	(2.1)	565,351	(11.689)	4,089	(31)
Government	287,143	(2.145)	1,852,337	(13.579)	16,291	(114)
Government	20,877	(45)	149,125	(325)	1,229	(3)
Government	149,740	148,848	892	0.6	-	-
Government	39,861,187	(121.490)	100,434,151	(738.677)	4,151,345	(28.827)
Government	4,186,416	37.709	1,174,425	10.594	1,979,953	17.777
Government	941	933	-	-	-	-
Government	4,187,358	37.718	1,174,425	10.594	1,979,953	17.777
Government	854,530	0.0	66,244	0.0	77,739	0.0
Government	1,678	0.0	4,302	0.0	-	-
Government	79,302	(0.0)	923,865	(923.865)	253,938	(253.938)
Government	1,643,645	1.643,644	7,195,166	7,195,006	3,580,405	3,580,405
Government	317,027	(0.0)	2,136,927	(2,136,927)	585,102	(585.102)
Government	12,229	(0.0)	60,793	(60.793)	31,684	(31.684)
Government	20,082	20,010	-	-	-	-
Government	2,072,285	2,072,212	10,316,751	10,316,591	4,451,129	4,451,129
Government	123,859	122.722	150,276	148.990	28,032	27.775
Government	1,927,930	(2.871)	6,992,941	(7.146)	1,182,083	(1.182,083)
Government	5,263,923	(27.948)	28,134,073	(163.108)	3,400,264	(3,400,264)
Government	4,945,801	(6.829)	34,059,127	(51.377)	4,872,082	(4,872,082)
Government	486,447	(2.828)	3,719,254	(19.316)	239,983	(241.366)
Government	665,081	(11.461)	6,845,382	(6.962,580)	458,590	(458,590)
Government	211,744	(8.19)	2,647,088	(9.750)	195,751	(195.751)
Government	76,958	76,822	-	-	-	-
Government	13,701,742	(51.483)	82,508,141	(82.874,650)	10,376,784	(10,376,784)
Government	947,945	823.567	316,148	266,479	1,847,608	1,847,608
Government	427,827	441	488,413	488,134	1,198,884	1,197,710
Government	330,301	327,286	189,946	174,747	308,191	305,387
Government	45,684	42,688	27,475	253	53,105	52,621
Government	2,506	2,487	-	-	-	-
Government	1,754,264	1,625,993	1,023,382	971,434	3,407,288	2,890,050
<b>Change</b>						
Government	21,807,405	197.623	54,273,024	491.770	2,589,862	23.463
Government	1,542,425	(1.2)	4,658,236	(1.1)	188,724	(3.939)
Government	9,035,064	(288.415)	34,696,924	(1,121.182)	1,285,947	(46.853)
Government	305,949	(320.175)	1,279,092	(60.252)	46,628	(1.519)
Government	612,924	607.316	2,971,751	2,944,565	18,579	170
Government	99,659	(2.1)	565,351	(11.689)	4,089	(31)
Government	287,143	(2.145)	1,852,337	(13.579)	16,291	(114)
Government	20,877	(45)	149,125	(325)	1,229	(3)
Government	149,740	148,848	892	0.6	-	-
Government	39,861,187	(121.490)	100,434,151	(738.677)	4,151,345	(28.827)
Government	4,186,416	37.709	1,174,425	10.594	1,979,953	17.777
Government	941	933	-	-	-	-
Government	4,187,358	37.718	1,174,425	10.594	1,979,953	17.777
Government	854,530	0.0	66,244	0.0	77,739	0.0
Government	1,678	0.0	4,302	0.0	-	-
Government	79,302	(0.0)	923,865	(923.865)	253,938	(253.938)
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Government	317,027	(0.0)	2,136,927	(2,136,927)	585,102	(585.102)
Government	12,229	(0.0)	60,793	(60.793)	31,684	(31.684)
Government	20,082	20,010	-	-	-	-
Government	2,072,285	2,072,212	10,316,751	10,316,591	4,451,129	4,451,129
Government	123,859	122.722	150,276	148.990	28,032	27.775
Government	1,927,930	(2.871)	6,992,941	(7.146)	1,182,083	(1.182,083)
Government	5,263,923	(27.948)	28,134,073	(163.108)	3,400,264	(3,400,264)
Government	4,945,801	(6.829)	34,059,127	(51.377)	4,872,082	(4,872,082)
Government	486,447	(2.828)	3,719,254	(19.316)	239,983	(241.366)
Government	665,081	(11.461)	6,845,382	(6.962,580)	458,590	(458,590)
Government	211,744	(8.19)	2,647,088	(9.750)	195,751	(195.751)
Government	76,958	76,822	-	-	-	-
Government	13,701,742	(51.483)	82,508,141	(82.874,650)	10,376,784	(10,376,784)
Government	947,945	823.567	316,148	266,479	1,847,608	1,847,608
Government	427,827	441	488,413	488,134	1,198,884	1,197,710
Government	330,301	327,286	189,946	174,747	308,191	305,387
Government	45,684	42,688	27,475	253	53,105	52,621
Government	2,506	2,487	-	-	-	-
Government	1,754,264	1,625,993	1,023,382	971,434	3,407,288	2,890,050
<b>Change</b>						
Government	21,807,405	197.623	54,273,024	491.770	2,589,862	23.463
Government	1,542,425	(1.2)	4,658,236	(1.1)	188,724	(3.939)
Government	9,035,064	(288.415)	34,696,924	(1,121.182)	1,285,947	(46.853)
Government	305,949	(320.175)	1,279,092	(60.252)	46,628	(1.519)
Government	612,924	607.316	2,971,751	2,944,565	18,579	170
Government	99,659	(2.1)	565,351	(11.689)	4,089	(31)
Government	287,143	(2.145)	1,852,337	(13.579)	16,291	(114)
Government	20,877	(45)	149,125	(325)	1,229	(3)
Government	149,740	148,848	892	0.6	-	-
Government	39,861,187	(121.490)	100,434,151	(738.677)	4,151,345	(28.827)
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Government	854,530	0.0	66,244	0.0	77,739	0.0
Government	1,678	0.0	4,302	0.0	-	-
Government	79,302	(0.0)	923,865	(923.865)	253,938	(253.938)
Government	1,643,645	1.643,644	7,195,166	7,195,006	3,580,405	3,580,405
Government	317,027	(0.0)	2,136,927	(2,136,927)	585,102	(585.102)
Government	12,229	(0.0)	60,793	(60.793)	31,684	(31.684)
Government	20,082	20,010	-	-	-	-
Government	2,072,285	2,072,212	10,316,751	10,316,591	4,451,129	4,451,129
Government	123,859	122.722	150,276	148.990	28,032	27.775
Government	1,927,930	(2.871)	6,992,941	(7.146)	1,182,083	(1.182,083)
Government	5,263,923	(27.948)	28,134,073	(163.108)	3,400,264	(3,400,2

**REVENUE, PIECES, AND WEIGHT BY CLASSES OF MAIL AND SPECIAL SERVICES FOR GOVERNMENT FISCAL YEAR 1998  
GOVERNMENT FISCAL YEAR 1998 (Oct. 1, 1997–Sep. 30, 1998) COMPARED WITH GOVERNMENT FISCAL YEAR 1997  
(Agency and Franked Mail Distributed – Data in Thousands)**

07/31/00  
PAGE 2

Service Category	REVENUE				PIECES				WEIGHT			
	Government Fiscal Year		Change 1998 over 1997		Government Fiscal Year		Change 1998 over 1997		Government Fiscal Year		Change 1998 over 1997	
	Final 1998	Orig. 1998	Amount	Percent	Final 1998	Orig. 1998	Amount	Percent	Final 1998	Orig. 1998	Amount	Percent
U.S. Postal Service Mail	-	-	-	-	380,103	376,668	3,435	0.9	96,248	95,453	795	0.8
Free Mail for the Blind and Handicapped	-	-	-	-	53,169	52,680	489	0.9	27,190	26,940	250	0.9
<b>Total Domestic Mail</b>	<b>56,433,042</b>	<b>56,439,953</b>	<b>(6,911)</b>	<b>(0.0)</b>	<b>195,960,669</b>	<b>196,999,228</b>	<b>(1,038,560)</b>	<b>(0.5)</b>	<b>24,567,677</b>	<b>24,080,205</b>	<b>487,472</b>	<b>2.0</b>
<b>International Mail:</b>												
Surface – Other Articles	57,462	57,461	1	0.0	28,216	28,215	0	0.0	33,321	33,321	0	0.0
– Parcel Post	57,663	57,607	55	0.1	2,314	2,312	2	0.1	24,148	24,124	23	0.1
– Periodicals	68,615	68,615	0	0.0	65,082	65,082	0	0.0	38,171	38,170	0	0.0
<b>Total Surface Mail</b>	<b>183,740</b>	<b>183,683</b>	<b>57</b>	<b>0.0</b>	<b>95,612</b>	<b>95,609</b>	<b>2</b>	<b>0.0</b>	<b>95,640</b>	<b>95,616</b>	<b>24</b>	<b>0.0</b>
Airmail – Letters and Cards	513,546	513,507	39	0.0	577,322	577,283	40	0.0	34,293	34,290	3	0.0
– Other Articles	194,869	194,833	36	0.0	45,023	45,017	6	0.0	30,576	30,570	5	0.0
– Parcel Post	124,203	124,029	173	0.1	4,246	4,240	6	0.1	30,184	30,143	41	0.1
<b>Total Airmail</b>	<b>832,618</b>	<b>832,369</b>	<b>249</b>	<b>0.0</b>	<b>626,591</b>	<b>626,540</b>	<b>52</b>	<b>0.0</b>	<b>95,053</b>	<b>95,004</b>	<b>49</b>	<b>0.1</b>
International Express Mail	135,418	135,418	0	0.0	5,389	5,389	0	0.0	12,581	12,581	0	0.0
International Surface Airlift Mail	116,120	116,120	0	0.0	163,587	163,587	0	0.0	36,898	36,898	0	0.0
International Priority Airmail	39,219	39,219	0	0.0	52,843	52,843	0	0.0	4,441	4,441	0	0.0
<b>International Mail Subtotal</b>	<b>1,307,115</b>	<b>1,306,810</b>	<b>305</b>	<b>0.0</b>	<b>944,022</b>	<b>943,968</b>	<b>54</b>	<b>0.0</b>	<b>244,612</b>	<b>244,539</b>	<b>73</b>	<b>0.0</b>
Foreign Postal Transactions	279,643	279,643	0	0.0	-	-	-	-	-	-	-	-
International Mail Fees	13,079	12,987	93	0.7	-	-	-	-	-	-	-	-
<b>Total International Mail</b>	<b>1,599,838</b>	<b>1,599,440</b>	<b>398</b>	<b>0.0</b>	<b>944,022</b>	<b>943,968</b>	<b>54</b>	<b>0.0</b>	<b>244,612</b>	<b>244,539</b>	<b>73</b>	<b>0.0</b>
<b>Total All Mail</b>	<b>58,032,880</b>	<b>58,039,393</b>	<b>(6,513)</b>	<b>(0.0)</b>	<b>196,904,691</b>	<b>197,943,197</b>	<b>(1,038,506)</b>	<b>(0.5)</b>	<b>24,812,289</b>	<b>24,324,744</b>	<b>487,545</b>	<b>2.0</b>
<b>Special and Other Services:</b>												
Registered	89,221	89,219	2	0.0	15,254	15,254	0	0.0				
Insurance	72,547	71,913	634	0.9	40,789	40,434	356	0.9				
Collect on Delivery	17,829	17,829	0	0.0	3,844	3,844	0	0.0				
Certified	385,745	382,241	3,504	0.9	278,298	275,770	2,527	0.9				
Return Receipts	262,058	259,685	2,373	0.9	237,256	235,108	2,149	0.9				
Special Delivery	1	1	0	1.0	1	1	0	1.0				
Money Orders	178,942	178,942	0	0.0	208,597	208,597	0	0.0				
<b>Total Special Services</b>	<b>1,006,343</b>	<b>999,830</b>	<b>6,513</b>	<b>0.7</b>	<b>784,038</b>	<b>779,006</b>	<b>5,032</b>	<b>0.6</b>				
Outstanding MO Taken into Revenue	31,177	31,177	0	0.0								
Stamped Envelopes	17,440	17,440	0	0.0								
Box Rents	617,434	617,434	0	0.0								
<b>Total Special and Other Services</b>	<b>1,672,395</b>	<b>1,665,882</b>	<b>6,513</b>	<b>0.4</b>								
<b>Total Mail and Services</b>	<b>59,705,275</b>	<b>59,705,275</b>	<b>(0)</b>	<b>(0.0)</b>								
<b>Other Revenue</b>	<b>486,982</b>	<b>486,982</b>	<b>0</b>	<b>0.0</b>								
<b>Total Revenue</b>	<b>60,192,256</b>	<b>60,192,256</b>	<b>(0)</b>	<b>(0.0)</b>								

Special Service Transactions  
U.S. Postal Service Mail  
Government Fiscal Year 1998 4/  
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Registered	14,700
Certified	1,114
Return Receipts	1,133
Special Delivery	0
Special Handling	4
<b>Total</b>	<b>16,952</b>

Attachment to Response to POIR 17, Question 7

REVENUE, PIECES, AND WEIGHT BY CLASSES OF MAIL AND SPECIAL SERVICES FOR GOVERNMENT FISCAL YEAR 1998  
GOVERNMENT FISCAL YEAR 1998 (Oct. 1, 1997–Sep. 30, 1998) COMPARED WITH GOVERNMENT FISCAL YEAR 1998  
(Agency and Franked Mail Distributed – Data in Thousands)

07/31/00  
PAGE 3

RPW SUMMARY REPORT FOOTNOTES

- 1/ The "Final 1998" column contains FY 1998 RPW data that were reestimated using new methodologies.
- 2/ Nonautomated office (non-Permit System) precanceled stamp and metered RPW data for First Class Presort and Standard Mail (A) bulk were estimated with mailing statements from a panel of offices.
- 3/ Permit imprint Standard Mail (B) parcel post RPW data were estimated using Permit System data.
- 4/ Not included elsewhere on this table.

– Totals may not sum due to rounding.

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

8. For the adjusted RPW volume and revenue estimates for Parcel Post in FY 1998 and the reported estimates in FY 1999, please provide the volume and revenue portions that were generated by each of the RPW subsystems. In your analysis include BRPW, DRPW, OMAS and any other subsystem or adjustment. Further, for the BRPW volume and revenue estimates, please provide the volume and revenue portions that were generated by the PERMIT or automated offices, non-automated offices and any other source or adjustment.

**RESPONSE.** For FY 1998, the estimates broken out by BRPW, DRPW, and other sources have been provided in the responses to UPS/USPS-T5-2, UPS/USPS-T4-6, and UPS/USPS-T4-3, respectively. For FY 1999, please see the responses to POIR No. 17, questions No. 2 (DRPW) and No. 3 (BRPW). In addition, the following table provides the source of other data for FY 1999:

	Standard (B) Parcel Post (data in thousands)		
	Revenue	Pieces	Weight
Alaska Bypass	13,125	1,966	96,728
Official Mail	8,279	1,327	13,199

Due to the high coverage level of the automated office component for permit imprint Parcel Post, no supplemental non-automated office panel is required under the BRPW. For the small non-automated office component for this mail category for FY 1999, the automated office data are multiplied by the blow-up factors provided in the response to question No. 4. For FY 1998, the factor of 1.00920754 is used. The automated office and non-automated office components for the FY 1998 and 1999 BRPW estimates are provided below.

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

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GFY	Rev. Auto	Rev. - Nonauto	Vol. - Auto	Vol. - Nonauto	LBS - Auto	LBS - Nonauto
1998	\$614,275	\$5,656	232,749	2,143	1,318,083	12,136
1999	\$689,902	\$20,106	246,022	7,038	1,427,449	40,022

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

9. Question 2(a) in POIR 15 asked the Postal Service to explain why the long-accepted DRPW sampling system underestimated Parcel Post volume by 50 million pieces, or 19 percent, in FY 1998 compared to the new BRPW/DRPW method. In its response, the Postal Service attributed the underestimation in the DRPW system to errors committed by the data collectors.

- a. Please describe the frequency of data collectors' training and provide the materials that were used to train the data collectors in FY 1998.
- b. Please specify what fraction of data collectors received training in FY 1998.
- c. Please describe the data collection quality control procedures applied during FY 1998 and discuss if the procedures were different for previous years.
- d. Were all DRPW sample observations for FY 1998 made and recorded by onsite data technicians? If not, please specify all other means used to make and record observations, and provide estimates of the proportion of observations made by each such method.

**RESPONSE:**

- a. During FY 1998, every district was to conduct at least one day of statistical programs training each postal quarter for each person involved in data collection. Districts developed their own training materials utilizing the Handbook F-75 (USPS-LR-I-37), and any instructions that may have been issued relating to such things as CODES-RPW software updates, or data collection policies. Since these training materials were kept locally, and there were no retention requirements, these materials cannot be provided.
- b. The percentage of data collectors who received training in FY 1998 is not known, but should approach 100 percent.
- c. Please see the response to UPS/USPS-T1-31, where witness Xie describes the monitoring or data collection quality control procedures in place for all

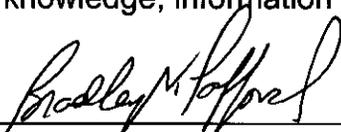
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PAFFORD TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 17

statistical programs, and USPS-LR-I-264 that provides PS Form 1444-F used to record monitoring observations for RPW. Similar monitoring forms were available for prior years, however, the monitoring requirements were optional.

- d. DRPW testing is conducted onsite by trained data collectors. The Handbook F-75 instructions do not present telephone 'readings' as an option for RPW data collection.

DECLARATION

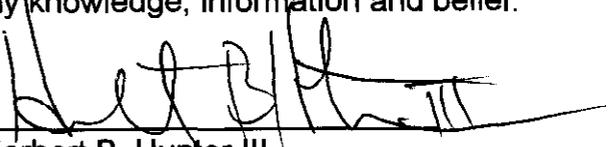
I, Bradley V. Pafford, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Bradley V. Pafford

Date: 8/3/00

DECLARATION

I, Herbert B. Hunter III, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
Herbert B. Hunter III

Date: 8/3/00

**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.

*K N Hollie*

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Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083 Fax -5402  
August 3, 2000

August 3, 2000