

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS NEEDHAM TO INTERROGATORIES OF  
THE AMERICAN BANKERS ASSOCIATION  
(ABA/USPS-T8-1-3)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of the American Bankers Association: ABA/USPS-T8-1-3, filed on August 12, 1996. These interrogatories were originally designated as ABA/USPS-T7-1-3. Since the subject matter of these interrogatories relates to USPS-T-8, which includes witness Needham's testimony on proposed changes to certified mail, the Postal Service redesignated these interrogatories as ABA/USPS-T8-1-3. Counsel for the Postal Service has contacted counsel for ABA and he expressed no opposition to this measure. Except as stated above, 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

*Anthony F. Alverno*  
Anthony F. Alverno

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2997; Fax -5402  
August 26, 1996

POSTAL RATE COMMISSION  
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RESPONSE OF U.S. POSTAL SERVICE WITNESS NEEDHAM  
TO INTERROGATORIES OF THE AMERICAN BANKERS ASSOCIATION

ABA/USPS-T8-1. In your response to interrogatory ABA/USPS-T1-1, redirected from witness Lyons, you mention products which are required by law and on which vendors set prices in accordance with market conditions. Specify those products whose use is required by law and whose "vendor" is a governmental entity protected by a governmentally imposed monopoly.

RESPONSE:

Although I am unfamiliar with any such vendor, I am also not aware of any specially imposed prices or rates offered to customers by vendors for products whose use is required by law by virtue of the fact that use of the vendor's product is required by law.

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ABA/USPS-T8-2. What percentage of the total volume of certified mail is First-Class Mail?

RESPONSE:

100 percent. Certified Mail is provided for matter mailed as First-Class Mail.

See DMCS SS-5.02

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ABA/USPS-T8-3. In your response to ABA/USPS-T1-1, redirected from witness Lyons, you mentioned alternatives to certified mail for mailers with a legal requirement to use certified mail. Please specify what those alternatives are.

RESPONSE:

Please refer to USPS LR-SSR-110 at p. 20. The alternatives to certified mail include couriers, competitors' tracked and traced mail products, and special messengers. According to the survey research, those products average \$10.68 more per piece than certified mail.

**DECLARATION**

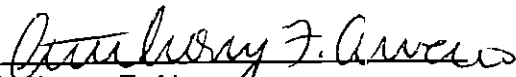
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: August 26, 1996

**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.

  
Anthony F. Alverno

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