

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

COMPLAINT OF THE CONTINUITY
SHIPPERS ASSOCIATION

Docket No. C99-4

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-32-35)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-32-35, filed on January 4, 2000.

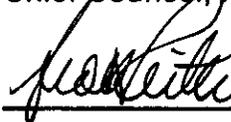
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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January 19, 2000

OCA/USPS-32.

- a. Please confirm that the Bound Printed Matter subclass consists of Standard Mail weighing at least 16 ounces, but not more than 15 pounds. If you do not confirm, please explain.
- b. Please confirm that the Bound Printed Matter subclass consists of three separate rate categories, single-pieces, presorted, and carrier route. If you do not confirm, please explain.
- c. Please confirm that the Bound Printed Matter rate categories of presorted and carrier route are for bulk mailings of at least 300 pieces. If you do not confirm, please explain.
- d. Please confirm that mail matter qualifying for the single-piece Bound Printed Matter rate category are not required to be "machineable." If you do not confirm, please explain.
- e. Please confirm that all parcel shaped mail pieces that qualify for any of the rate categories of the Bound Printed Matter subclass do not qualify for return via Bulk Parcel Return Service (BPRS). If you do not confirm, please explain, and identify those Bound Printed Matter parcel shaped mail pieces that qualify for BPRS.
- f. Please confirm that neither the DMCS nor the DMM authorize a return service specifically dedicated to the return of material qualifying for the presorted and carrier route rate categories of Bound Printed Matter. If you do not confirm, please explain.

RESPONSE:

- a.-f. Confirmed.

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OCA/USPS-33. Other than BPRS, is the Postal Service aware of any economically realistic alternative for mailers for the return of Standard (A) parcels?

RESPONSE:

Although mailers are in a better position to judge what is "economically realistic" for their businesses, if the question means to ask whether BPRS is the least expensive and most convenient method for return of Standard (A) parcels, the Postal Service can confirm that that is so.

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OCA/USPS-34. Please confirm that the minor classification changes recommended by the Commission and approved by the Governors in Docket No. MC99-4 for Bulk Parcel Return Service eliminated the legal and business uncertainty for mailers as to the return by the Postal Service of Standard (A) parcels that have been opened, resealed, and redeposited into the mail. If you do not confirm, please explain.

RESPONSE:

Confirmed that the changes resulting from Docket No. MC99-4 provided a regularized, definite, and reliable method for return to the original mailers of Standard (A) parcels that had been opened, resealed, and redeposited into the mail by the recipients without the payment of return postage by the recipients or the use of Merchandise Return Service.

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OCA/USPS-35. Please update Table 1 of the BPRS cost study, as revised, for any new mailers that have qualified for BPRS service.

RESPONSE:

This information has not been collected.

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.



Scott L. Reiter

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