

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS VAN-TY-SMITH TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T17-3-5)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T17-3-5, filed on February 3, 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



Susan M. Duchek

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February 17, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO
DMA INTERROGATORIES**

DMA/USPS-T17-3. Please refer to Table 2 (page 26) of your testimony. For each percentage figure in this table, please provide the corresponding total number of tallies and the corresponding total tally dollar amount of those tallies.

RESPONSE TO DMA/USPS-T17-3.

The total tally dollar amount corresponding to each percentage figure in Table 2 of my testimony was provided in the 'Facility' sheet of the excel table in LR-I-184 (see my response to DMA/USPS-T17-1). The corresponding total number of tallies is provided in the table attached to this response (please see the footnote to the table for an interpretation of what the numbers for the identified containers represent).

Response to DMA/USPS-T17-3
 Table 2. Number of Tallies by Handling ('direct' & 'mixed')
 and Not-Handling Categories, and by Facility Groupings

TABLE OF DKGR BY FACILITY

DKGR	FACILITY			Total
	BMCS	MODS	NONMODS	
Frequency				
direct pieces	2699	52175	9628	64502
direct Item	1553	16783	2230	20566
direct Container	75	501	54	630
mixd item/empty	331	4387	500	5218
mixd item/uncnt	66	1234	140	1440
mixd cont pieces	504	3424	617	4545
mixd cont Items	394	6343	504	7241
mixd cont/unidfd	67	389	229	685
mixd cont/Empty	698	6934	962	8594
NOT HANDLING	6456	80617	6178	93251
Total	12843	172787	21042	206672

Note: the number of tallies for 'mix cont pieces' and 'mixd cont/Items' is the number of records resulting from Program MOD1DIR where a separate record is created for each non-zero percentage recorded for an item type or shape of loose mail identified with a container tally

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO
DMA INTERROGATORIES**

DMA/USPS-T17-4. For each facility grouping, please provide the percentage of dollar-weighted direct tallies by class and subclass. Also provide the corresponding total number of direct tallies for each class and subclass of each facility grouping, and the total tally dollar amount of the direct tallies for each class and subclass of each facility grouping.

RESPONSE TO DMA/USPS-T17-4.

See the two tables in the attachment to this response. The total direct tally dollar amount and the direct tally dollar-weighted percentage by class and subclass for each facility grouping are provided in the first table. The corresponding total number of direct tallies by class and subclass for each facility grouping is provided in the second table.

Response to DMAT17_04
Dollar-Weighted Direct Tallies by Class and Subclass
By Facility Grouping
Col Pct = Percentage of Dollar-Weighted Direct Tallies

TABLE OF MAIL BY FACILITY

MAIL	FACILITY			
Frequency Percent Col Pct	BMCS	MODS	NONMODS	Total
1--LTRS SGL PC	1159.8 0.02 0.56	2024302 33.26 45.82	622134 10.22 42.55	2647596 43.51
2--LTRS PRESORT	201.31 0.00 0.10	469750 7.72 10.63	164356 2.70 11.24	634307 10.42
3--CARDS SGL PC	106.2 0.00 0.05	84887 1.39 1.92	20500 0.34 1.40	105493 1.73
4--CARDS PRSORT	0 0.00 0.00	14769 0.24 0.33	7027.7 0.12 0.48	21797 0.36
5--PRIORITY	1387.4 0.02 0.67	232009 3.81 5.25	65812 1.08 4.50	299208 4.92
6--EXPRESS	0 0.00 0.00	38830 0.64 0.88	9263 0.15 0.63	48093 0.79
7--MAILGRAM	0 0.00 0.00	115.43 0.00 0.00	0 0.00 0.00	115.43 0.00
8-1 IN COUNTY	32.967 0.00 0.02	3752.7 0.06 0.08	3417.8 0.06 0.23	7203.5 0.12
8-2 PER.REGULR	7554.4 0.12 3.67	206036 3.39 4.66	79227 1.30 5.42	292817 4.81
8-3 PER.NONPRF	1892.3 0.03 0.92	34874 0.57 0.79	11950 0.20 0.82	48716 0.80
Total	205582 3.38	4417882 72.60	1461962 24.02	6085426 100.00

(Continued)

Response to DMAT17-04
Dollar-Weighted Direct Tallies by Class and Subclass
By Facility Grouping
Col Pct = Percentage of Dollar-Weighted Direct Tallies

TABLE OF MAIL BY FACILITY

MAIL	FACILITY			
Frequency Percent Col Pct	BMCS	MODS	NONMODS	Total
8-4 PER.CLASSR	170.13 0.00 0.08	1650.4 0.03 0.04	759.86 0.01 0.05	2580.4 0.04
9-- (A) SGL PC	4118.8 0.07 2.00	31200 0.51 0.71	9692.2 0.16 0.66	45011 0.74
10-- (A) REG/ENH	5072.4 0.08 2.47	99303 1.63 2.25	48636 0.80 3.33	153011 2.51
11-- (A) REG/OTHR	82201 1.35 39.98	712984 11.72 16.14	275899 4.53 18.87	1071084 17.60
12-- (A) NPRF/ENH	1579.4 0.03 0.77	15793 0.26 0.36	4530.2 0.07 0.31	21902 0.36
13-- (A) NPRF/OTH	10148 0.17 4.94	160535 2.64 3.63	50056 0.82 3.42	220739 3.63
14-- (B) PARCELS	36715 0.60 17.86	33651 0.55 0.76	16992 0.28 1.16	87357 1.44
15-- (B) BD PRINT	18671 0.31 9.08	18911 0.31 0.43	10060 0.17 0.69	47642 0.78
16-- (B) SPECIAL	14964 0.25 7.28	10740 0.18 0.24	5094.2 0.08 0.35	30798 0.51
17-- (B) LIBRARY	1542.3 0.03 0.75	2368.3 0.04 0.05	1136.6 0.02 0.08	5047.3 0.08
Total	205582 3.38	4417882 72.60	1461962 24.02	6085426 100.00

(Continued)

Response to DMAT17_04
 Dollar-Weighted Direct Tallies by Class and Subclass
 By Facility Grouping
 Col Pct = Percentage of Dollar-Weighted Direct Tallies

TABLE OF MAIL BY FACILITY

MAIL	FACILITY			
Frequency Percent Col Pct	BMCS	MODS	NONMODS	Total
18--USPS	5744.6 0.09 2.79	53072 0.87 1.20	13366 0.22 0.91	72183 1.19
19--FREE MAIL	807.83 0.01 0.39	4446.6 0.07 0.10	1266 0.02 0.09	6520.4 0.11
20--INTL MAIL	11142 0.18 5.42	99074 1.63 2.24	6587.1 0.11 0.45	116803 1.92
21--REGISTRY	0 0.00 0.00	21744 0.36 0.49	3463.4 0.06 0.24	25207 0.41
22--CERTIFIED.	0 0.00 0.00	13512 0.22 0.31	18537 0.30 1.27	32049 0.53
23--INSURED	0 0.00 0.00	475.99 0.01 0.01	597.64 0.01 0.04	1073.6 0.02
24--COD	0 0.00 0.00	607.33 0.01 0.01	348.55 0.01 0.02	955.88 0.02
25--SPECIAL HAND	0 0.00 0.00	53.645 0.00 0.00	0 0.00 0.00	53.645 0.00
26--OTHER SERVCS	177.02 0.00 0.09	21679 0.36 0.49	8581.8 0.14 0.59	30438 0.50
5340	194.76 0.00 0.09	6758 0.11 0.15	2670.2 0.04 0.18	9622.9 0.16
Total	205582 3.38	4417882 72.60	1461962 24.02	6085426 100.00

Response to DMAT17_04
Number of Direct Tallies by Class and Subclass
By Facility Grouping

TABLE OF MAIL BY FACILITY

MAIL	FACILITY			Total
Frequency	BMCS	MODS	NONMODS	
1--LTRS SGL PC	22	30270	4991	35283
2--LTRS PRESORT	6	7010	1278	8294
3--CARDS SGL PC	2	1319	168	1489
4--CARDS PRSORT	0	240	54	294
5--PRIORITY	27	4035	562	4624
6--EXPRESS	0	811	89	900
7--MAILGRAM	0	2	0	2
8-1 IN COUNTY	27	163	34	224
8-2 PER.REGULR	155	3079	651	3885
8-3 PER.NONPRF	63	636	105	804
8-4 PER.CLASSR	28	123	11	162
9--(A) SGL PC	89	465	89	643
10--(A) REG/ENH	86	1496	421	2003
11--(A) REG/OTHR	1561	10332	2227	14120
12--(A) NPRF/ENH	26	234	42	302
Total	4327	69459	11912	85698
(Continued)				

Response to DMAT17 04
Number of Direct Tallies by Class and Subclass
By Facility Grouping

TABLE OF MAIL BY FACILITY

MAIL	FACILITY			
Frequency	BMCS	MODS	NONMODS	Total
13-- (A) NPRF/OTH	223	2356	412	2991
14-- (B) PARCELS	664	546	152	1362
15-- (B) BD PRINT	332	289	88	709
16-- (B) SPECIAL	279	162	46	487
17-- (B) LIBRARY	29	34	9	72
18--USPS	75	822	114	1011
19--FREE MAIL	17	63	13	93
20--INTL MAIL	610	3892	62	4564
21--REGISTRY	0	454	28	482
22--CERTIFIED.	0	207	153	360
23--INSURED	0	8	4	12
24--COD	0	10	3	13
25--SPECIAL HAND	0	1	0	1
26--OTHER SERVCS	3	301	80	384
5340	3	99	26	128
Total	4327	69459	11912	85698

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO
DMA INTERROGATORIES**

DMA/USPS-T17-5. Please refer to programs MBC, MODIPOOL, NONMOD1, and BMC1 associated with LR-1-106. Running these programs on the IOCS data file produces datasets containing three activity codes that are not referenced in Tables B-1 or B-2 of USPS LR-1-1. These activity codes are 2068, 3068, and 4068. From program MOD1 POOL (lines 06940002-06960002), it appears that these activity codes are related, respectively, to the activity codes 2060, 3060, and 4060. Please confirm that the shape, class, and subclass information for activity codes 2068, 3068, and 4068 is the same as for the corresponding activity codes 2060, 3060, and 4060, respectively. If this is not the case, please provide the appropriate shape, class, and subclass information for these activity codes.

RESPONSE TO DMA/USPS-T17-5.

Confirmed.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Ty Smith

Dated: 2/17/00

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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