

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 THE UNITED STATES POSTAL SERVICE
TO MPA INTERROGATORIES REDIRECTED FROM WITNESS BARON
(MPA/USPS-T12-32-35)

The United States Postal Service hereby provides responses to the following interrogatories of the Magazine Publishers of America: MPA/USPS-T12-32-35, filed on February 18, 2000. Interrogatories 32 through 35 were redirected from witness Baron to the Postal Service.

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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March 6, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE
MAGAZINE PUBLISHERS OF AMERICA REDIRECTED FROM WITNESS BARON

MPA/USPS-T12-32. Within ALDRAN.HQ059T01.CITY.PQ4FY97 please provide the full definitions for the following terms ("variables"). Please also state how these definitions are determined by USPS, and how the Postal Service distinguishes among them:

- (a) Foot Delivery Mode
- (b) Curblin Delivery Mode
- (c) Park & Loop Delivery Mode
- (d) Dismount Delivery Mode
- (e) Other Delivery Mode

RESPONSE:

- (a) Foot Delivery Mode – A route served on foot. A bicycle or other conveyance used solely as transportation to and from the route does not affect the status of the status of the foot route.
- (b) Curblin Delivery Mode – A motorized route on which 50% or more of the possible deliveries are made to customer mailboxes at the curb.
- (c) Park & Loop Delivery Mode – A route that uses a motor vehicle for transporting all classes of mail to the route. The vehicle is used as a movable container as it is driven to the designated park points from which segments of the route are delivered on foot.
- (d) Dismount Delivery Mode – A delivery route on which 50% or more of the possible deliveries are made by dismount delivery to the door, Vertical Improved Mail (VIM) Room, Cluster Box Units, Delivery Centers, etc. If the dismount deliveries are less than 50% of the total possible deliveries of a route, the route will be classified as per the majority of the type of delivery ; e.g. curblin, park and loop, etc.
- (e) Other Delivery Mode – Delivery made by a more unusual method, i.e. mule, boat, plane, bicycle, etc.

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MPA/USPS-T12-33 As to your response to 32(e), please further state the identification of the types of deliveries that may be included within this category.

RESPONSE:

All types of deliveries may be included in other delivery mode.

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MPA/USPS-T12-34 Within ALDRAN.HQ059T01.CITY.PQ4FY97 please provide the full definitions for the following terms ("variables") so that they can be distinguished from each other:

- (a) Curb Deliveries
- (b) NDCBU Deliveries
- (c) Centralized Deliveries
- (d) Other Deliveries

RESPONSE:

- (a) Curb Deliveries – Delivery from a vehicle to mailboxes mounted at the curb. If there is a parcel too large for the box; signature-required mail or the box is temporarily blocked, it is usually necessary to leave the vehicle and attempt delivery to the customer directly.
- (b) NDCBU Deliveries – Delivery to a central location that has a specific type of delivery equipment, i.e. Cluster Box Units. These units have 8, 12, 13, or 16 customer compartments, a dedicated collection compartment, and one or two parcel receiving compartments. The unit is opened via a Postal owned lock and mail is deposited into individual customer compartments.
- (c) Centralized Deliveries – Delivery to grouped locked mailboxes in a central location that uses either wall mounted post office boxes or apartment style mail receptacles. The unit is opened via a Postal owned lock and mail is deposited into individual customer compartments.
- (d) Other Deliveries – Delivery to a customer's doorslot or mailbox usually located on a house, or a post mounted box located behind the sidewalk. Delivery is made by foot.

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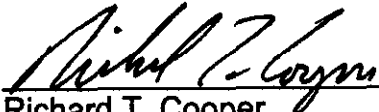
MPA/USPS-T12-35 As to your response to question 34(d), please further identify the types of deliveries that are considered to fall within this category.

RESPONSE:

Delivery to a customer's doorslot or mailbox usually located on a house, or a post mounted box located behind the sidewalk.

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.


Richard T. Cooper

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