

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 KINGSLEY TO INTERROGATORY OF  
THE MAJOR MAILERS ASSOCIATION.  
(MMA/USPS-T10-3)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of the Major Mailers Association:

MMA/USPS-T10-3, filed on March 7, 2000.

The 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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(202) 268-2990 Fax -5402  
March 21, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY  
TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION**

**MMA/USPS-T10-3.** Please refer to your answer to MMA/USPS-T10-1. In that response you provide the volume of prebarcoded letters that were mailed in AP13 of FY 99.

- (a) What are the corresponding outgoing letter volumes separately for First-Class nonpresorted, presorted and Standard Mail (A) for that same time period?
- (b) Please identify the source(s) of your data and provide all copies of, or references to, such source documents.
- (c) In your opinion, is AP 13 of FY 99 representative of a full year? Please explain your answer and provide any studies or other documents you reviewed in formulating your answer to this question.
- (d) What is the volume of outgoing prebarcoded letters sent at First-Class nonpresorted rates (excluding QBRM) for the base year in this case?
- (e) What is the volume of prebarcoded reply envelopes mailed out at (1) nonpresorted rates, (2) presorted rates, and (3) nonpresorted and presorted rates combined?

**Response:**

- (a) For AP 13, FY 1999, the First-Class presort volume was 2,857,913,000. Standard (A) volume for this period was 2,510,592,000. Automation rate mail requires presort so I assume that when you refer to pre-barcoded non-presorted First-Class letters, you're referring to reply mail and the volume for that period was 532,225,000.
- (b) The reference for Reply Mail Pre-barcode is the ODIS (Origin Destination Information System) report. The Rate Pre-barcode (First-Class letter presort and Standard (A)) is CBCIS (Corporate Business Customer Information System) report.

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- (c) The average volume of pre-barcoded letters for the year is lower, as would be expected since trends are slightly increasing. The AP13 letter volume represented our current volumes and provides an actual starting place for looking to the FY 2001 environment.
- (d) In FY 1998, the outgoing pre-barcoded letters, sent at First-Class non-presorted rates (excluding QBRM) for the base year, was 7,332,781,000.
- (e) We do not track the amount of reply envelopes that would be mailed out presorted (perhaps by a presort bureau). The vast majority of reply envelopes are mailed at the FCM non-presort rate.

**DECLARATION**

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

Linda A. Kingsley  
Date: 3-21-2000

**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 solid horizontal line.

Susan M. Duchek

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