

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

RECEIVED  
MAR 22 4 25 PM '00  
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 INTERROGATORY OF PITNEY BOWES  
(PB/USPS-T33-3)

The United States Postal Service hereby provides its response to the following interrogatory of Pitney Bowes: PB/USPS-T33-3, filed on March 8, 2000. The interrogatory has been redirected from witness Fronk to the Postal Service for response. The interrogatory is stated verbatim and is followed by the response.

T33-4 has been redirected from witness Fronk to witness Mayo for response.

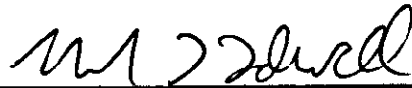
T33-5 has been redirected from witness Fronk to witness Meehan for response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
March 22, 2000

**RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES  
OF PITNEY BOWES REDIRECTED FROM WITNESS FRONK**

**PB/USPS-T33-3.** Please refer to your response to MMA/USPS-T33-1 and the Postal Service's response to PB/USPS-T11-1 (redirected from witness Meehan). According to your response to MMA/USPS-T33-1, in FY 1998 and FY 1999 the percentage of Nonpresort (Letters, Flats & Parcels) that is Metered Letters was 34.99 and 34.07, respectively. According to PB/USPS-T11-1, the percentage of single piece First-Class Mail that was metered in FY 1998 and FY 1999 was 48.84 and 49.39 percent, respectively.

- (a) Please reconcile the above percentages.
- (b) The RPW Report (Revised) for GFY 1998 shows 53,781,254,000 single piece Letters, Flats and IPPS. Please provide both the number and percentage that were (i) metered, (ii) stamped, (iii) permit and (iv) other (specify) and indicate the source used to derive the percentages.
- (c) The RPW Report (Revised) for GFY 1998 shows 2,944,565,000 Single-Piece cards. Please provide both the number and percentage that were (i) metered, (ii) stamped, (iii) permit and (iv) other (specify) and indicate the source used to derive the percentages.

**RESPONSE:** This interrogatory contains numerical errors which need to be corrected in order to address the specific questions raised. First, the percentages quoted from PB/USPS-T11-1 are for stamped mail, not metered mail. Per the response to PB/USPS-T11-1, the metered mail percentage for FY 1998 is 44.01 percent, not 48.84 percent. The metered mail percentage for FY 1999 is 43.43 percent, not 49.39 percent. Second, parts (b) and (c) above quote incorrect revised RPW numbers for GFY 1998. The 53,781,254,000 quoted in part (b) should be 54,273,024,000, and the 2,944,565,000 quoted in part (c) should be 2,971,751,000.

- (a) The response to PB/USPS-T11-1 provided the percentage of all single-piece mail that was metered, regardless of shape (letters, flats, parcels, and cards). The response to MMA/USPS-T33-1 focused on metered letters only and provided the percentage of single-piece letters, flats, and parcels that was metered letters, as indicated in that response's column headings. Also, the data sources used were different, as indicated in the responses. The percentage data presented in the response to MMA/USPS-T33-1 were from ODIS, while the percentage data presented in the response to PB/USPS-T11-1 were from RPW.

Using 1998 as an example, the metered letter percentage of 34.99 percent

**RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES  
OF PITNEY BOWES REDIRECTED FROM WITNESS FRONK**

**RESPONSE to PB/USPS-T33-3 (continued)**

presented in the response to MMA/USPS-T33-1 was derived using single-piece ODIS data presented in the attachment to the response to OCA/USPS-42 (metered letters with FIM of 490,776,846 + metered letters without FIM of 18,787,203,524 / total letters, flats, and parcels of 55,101,443,230). To calculate the same overall metered percentage shown in PB/USPS-T11-1 using the ODIS data presented in the attachment to OCA/USPS-42, one would pull total metered data for letters, flats, parcels, and cards combined and divide by total single-piece First-Class Mail (514,355,093 + 23,772,563,936 / 58,608,618,102). The result, 41.44 percent, is now calculated on the same shape basis as PB/USPS-T11-1, but differs from the 44.01 percent in PB/USPS-T11-1 due to the difference in the underlying data sources.

- (b) The requested indicia breakdown of First-Class single-piece letters, flats, and parcels from domestic RPW for GFY 1998 is:

	Vol (000)	Percent
Metered	24,325,432	44.8%
Stamped	26,340,548	48.5
Permit	3,361,422	6.2
Other	245,622	0.5
Total	54,273,024	100%

- (c) The requested indicia breakdown of First-Class single-piece cards from domestic RPW for GFY 1998 is:

	Vol (000)	Percent
Metered	817,229	27.5%
Stamped	1,546,077	52.0
Permit	597,639	20.1
Other	10,806	0.4
Total	2,971,751	100%

**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.



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998 Fax -5402  
March 22, 2000