

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

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS SMITH
(ANM/USPS-T21-13-14)

The United States Postal Service hereby provides responses to the following interrogatories of the Alliance of Nonprofit Mailers: ANM/USPS-T21-13-14, filed on March 10, 2000. Interrogatories 13 and 14 have been redirected from witness Smith.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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March 24, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS SMITH**

ANM/USPS-T21-13. How many plant and distribution centers ("P&DCs") did the Postal Service have in FY 1998?

Response:

At the present time the Postal Service has 180 processing and distribution centers ("P & DCs"). In addition, there are 88 processing and distribution facilities ("P & DFs"). See also the response to DFC/USPS-47b for a list of the these facilities.

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ANM/USPS-T2I-14. Of the total number of P&DCs which the Postal Service had in FY 1998, (i) how many had separate, unattached warehouse space for offloading and temporarily holding mail until the P&DC was ready to process the mail, and (ii) how many regularly used trailers or vans to store mail until the plant was ready to process the mail? If you do not have precise data, provide the best information or estimate available.

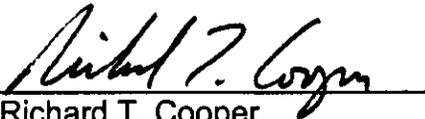
Response:

- (i) The Postal Service is aware of no data on the use of unattached warehouse space for offloading and temporarily holding mail. It is believed that such occurrences, if they happen at all, are very rare.
- (ii) Your definition of "regularly" is unclear. For the purpose of this response, "regularly" shall be defined as 100 or more days per year. Available data shows that in FY 98, only 3 P&DCs had one or more delayed vans on 100 or more days. A delayed van is a van that was on hand for over 24 hours without being unloaded.

If one defines "regularly" to be 50 or more days per year, then in FY98, there were 7 P&DCs (including the 3 with 100 or more days) which had one or more delayed vans on 50 or more days.

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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