

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
TO INTERROGATORY OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS VAN TY SMITH
(TW/USPS-T17-24)

The United States Postal Service hereby provides its response to the following interrogatory of Time Warner, Inc.: TW/USPS-T17-24, filed on March 14, 2000, and redirected from witness Van Ty Smith.

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



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March 28, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER
REDIRECTED FROM WITNESS VAN-TY-SMITH**

TW/USPS-T17-24. What is the Postal Service's best estimate of the volume of non-carrier route presorted flats in FY96 and in FY98 respectively? If such information is available by class, please provide it.

Response:

Volumes for non-carrier route presorted flats for First-Class and Standard A/third-class for both years can be obtained from USPS LR-I-233, which is Material Supporting the Response of Witness Smith to POIR No. 4. See the spreadsheet VOL89-99.xls.

Volumes by shape and presort are not available for Periodicals/Second-Class. The available data for FY96 are from Docket No. R97-1, which is the billing determinants contained in USPS-LR-H-145 and in addition USPS-LR-H-129, page I-4, provides from ODIS that 90.86 percent of Second-Class pieces are flat shaped. The corresponding information for this docket for FY98 is USPS-LR-I-125 for the billing determinants and 92.2 percent of Periodicals pieces are flat shaped as per USPS-LR-I-81, page II-3.

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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