

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 INTERROGATORIES OF ADVO, INC.
(ADVO/USPS-1-3, 5-6, 8)

The United States Postal Service hereby provides response to the following interrogatories of the ADVO: ADVO/USPS-1-3, 5-6, and 8, filed on March 23, 2000. An objection is being filed today to ADVO/USPS-7, and a response to ADVO/USPS-4 is still under development.

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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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-1 To the extent available, please provide estimated total weight, total volume, and total number of containers by point of entry for ECR mail in the following format. If information is also available by shape and or density level, please provide that information as well. For any data provided, please identify the source.

	Mailer-Prepared Rolling Containers	Mailer-Prepared Pallets (w/ Trays or Bundles)	Mailer-Prepared Trays	Mailer-Prepared Sacks	All Other Mailer-Prepared Containers
Entered at Origin Facility					
Entered at DBMC					
Entered at DSCF					
Entered at DDU					

For "all other" containers, please describe the types of containers included.

If there is information on ECR container and entry profiles, but not in the precise format shown above, please provide the available information and explain the format of the data.

Response:

Refer to Attachment F, Table 4.1 of Witness Crum's (T-27) testimony. This table lists by pieces and weight the entry profile based on mail preparation method for Commercial Rate Standard Mail (A). I am told this information is not available for only ECR mail.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-2 For each of the mailer-prepared container types identified in ADVO/USPS-1, please provide the specified weight limitations.

Response:

The maximum weight of pallet is 2200 pounds as stated in DMM M041.5.5. The maximum weight of a sack is 70 pounds as stated in DMM M033.1.1. The maximum weight of a tray is not specified, but it should not and, most likely, would not exceed 70 pounds. The maximum weight for a rolling container depends on the specific container being used. Two common examples are the General Purpose Mail Container and the BMC Over-the-Road Container, which have maximum loads of 1200 pounds and 1500 pounds, respectively.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-3 Please provide the following information, and indicate their sources:

(a) The most recent conversion factors (pieces and/or weight) available on all container types prepared in-house by the USPS.

(b) Any information or estimates available on the proportion of in-house containers containing volume which are filled to capacity either by weight or by volume.

(c) The weight limitations on all container types prepared in-house by the USPS.

(d) Piece and container weight limitations for all mechanized and automated equipment.

Response:

a) See attachments for MODS and Mail Condition Reporting System conversion factors.

b) We do not track the extent to which postal or mailer prepared containers are filled to capacity.

c) The weight limitations on all container types prepared in-house by the USPS are the same as in the DMM, Section M033, (e.g., 70 lbs. for sacks and trays).

d) As stated in the DMM, the following are piece weight limitations for:

FSM 881 – 1lb.

FSM 1000 – 6 lbs.

SPBS – 20 lbs.

BMC Parcel Sorter Machine – 35 lbs. (25 lbs. for books or other printed material)

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

Automation Letters – Weight: Not more than 2.5 ozs. for Upgradable Presort First-Class and Upgradable Standard Mail.

Automation Letters – Weight: Not more than 3 ozs. for Automation First-Class Mail and Periodicals. For Automation rate Standard Mail, not more than the piece/pound breakpoint (approx. 3.3 ozs.) which varies for regular, non-profit, and Enhanced Carrier Route. See DMM C810.2.3.

MODS Conversion Rates

Source		<i>New</i>	<i>Old</i>					
_Type	Description	N_Rate	O_Rate	Type	Mail	Handling	Action	
01	Machine Canceled	35.51	41.74	Machinable	Letters	FHP	+	
02	Metered Prep Pref	27.88	30.43	Machinable	Letters	FHP	+	
03	Metered Bypass Pref	28.25	31.2	Machinable	Letters	FHP	+	
04	Metered Prep Std	22.22	22.9	Machinable	Letters	FHP	+	
05	Metered Bypass Std	19.6	22.9	Machinable	Letters	FHP	+	
06	Opening Unit Mixed Pref	28.55	35.42	Machinable	Letters	FHP	+	
07	Opening Unit Mixed Std	18.11	19.48	Machinable	Letters	FHP	+	
08	Category C- OCR Readable	1	1	Machinable	Letters	INVALID	+	
09	Second Handling, Mixed, Std	18.11	19.48	Machinable	Letters	TPH	+	
10	Second Handling, Mixed, Pref	28.55	35.42	Machinable	Letters	TPH	+	
11	Hand Canceled	21.42	12.84	Non-Machinable	Letters	FHP	+	
12	Metered Prep, Pref	21.52	19.26	Non-Machinable	Letters	FHP	+	
13	Metered Bypass, Pref	15.07	15.97	Non-Machinable	Letters	FHP	+	
14	Metered Prep, Std	11.61	18.3	Non-Machinable	Letters	FHP	+	
15	Metered Bypass, Std	14.14	19.1	Non-Machinable	Letters	FHP	+	
16	Opening Unit Mixed Pref	21.02	24.2	Non-Machinable	Letters	FHP	+	
17	Opening Unit Mixed Std	13.57	15.9	Non-Machinable	Letters	FHP	+	
18	Barcode A Field	1	1	Machinable	Letters	INVALID	+	
19	Barcode B Field	1	1	Machinable	Letters	INVALID	+	
20	Barcode C Field	1	1	Machinable	Letters	INVALID	+	
21	Barcode B' Prime Field	1	1	Machinable	Letters	INVALID	+	
22	Barcode C' Prime Field	1	1	Machinable	Letters	INVALID	+	
23	Pre-Barcode B Field	1	1	Machinable	Letters	INVALID	+	
24	Pre-Barcode C Field	1	1	Machinable	Letters	INVALID	+	
	Second Handling							
25	Metered Prep/Metered Bypass Std	13.66	22.9	Non-Machinable	Letters	TPH	-	
26	Pre Barcode B' Prime Field	1	1	Machinable	Letters	INVALID	+	
27	Machine Rejects	35.42	35.42	Machinable	Letters	TPH	-	
28	Auto/Mech Second Handling	1	1	Machinable	Letters	TPH	+	
29	Riffle Mail	30.43	30.43	Non-Machinable	Letters	TPH	+	
30	Pre Barcoded C'Prime Field	1	1	Machinable	Letters	INVALID	+	
31	Inventory Hand Canceled	21.42	12.84	Non-Machinable	Letters	FHP	+	
32	Inventory Metered Preparation, Pref	21.52	19.26	Non-Machinable	Letters	FHP	+	
33	Pre Barcoded Unique 5-Digit	1	1	Machinable	Letters	INVALID	+	
34	Inventory Opening Unit, Std	13.57	15.9	Non-Machinable	Letters	FHP	+	
35	Inventory Second Handling, Std	13.57	15.9	Non-Machinable	Letters	TPH	+	
36	Inventory Opening Unit, Mixed Pref	21.02	24.2	Non-Machinable	Letters	FHP	+	
37	Inventory Second Handling, Pref	21.02	24.2	Non-Machinable	Letters	TPH	+	
38	Category B - Script	1	1	Machinable	Letters	INVALID	-	
39	Rework	23.72	35.42	Machinable	Letters	FHP	+	
40	400 Bin	35.42	35.42	Machinable	Letters	TPH	-	
41	Letters, Destination	30.98	44.2	Foreign	Letters	FHP	+	
42	Letters, Origin	35.56	55.6	Foreign	Letters	FHP	+	
43	Total Unique 5- digit	1	1	Machinable	Letters	INVALID	+	
44	Withdraw - Foreign Origin	35.56	55.6	Foreign	Letters	TPH	-	
45	Inventory Foreign Origin	35.56	55.6	Foreign	Letters	FHP	+	
46	Inventory Foreign Origin	35.56	55.6	Foreign	Letters	TPH	+	
47	Local Cancellations	33.19	41.74	Machinable	Letters	FHP	+	
48	Console Reading	1	1	Machinable	Letters	INVALID	+	
49	Carrier Bypass	1	1		Letters	INVALID	+	
50	Rework Bin and Key Errors	3.57	4.33		Flats	FHP	+	
51	Machine Canceled	4.72	4.91		Flats	FHP	+	
52	Meter Preparation	4.18	4.22		Flats	FHP	+	
53	Meter Bypass	4.49	4.22		Flats	FHP	+	
54	Opening Unit, Mixes Pref	3.57	4.33		Flats	FHP	+	
55	Opening Unit, Newspapers	2.78	2.22		Flats	FHP	+	

56	Category A - FIM	1	1	Flats	INVALID	+
57	Inventory Mixed Pref	3.57	4.33	Flats	FHP	+
58	Inventory Mixed Pref	3.57	4.33	Flats	TPH	+
59	Inventory Newspapers	2.78	2.22	Flats	FHP	+
60	Inventory Newspapers	2.78	2.22	Flats	FHP	+
61	Inventory Flats, Origin	4.59	4.9	Flats	FHP	+
62	Inventory Foreign	4.59	4.9	Flats	FHP	+
63	Withdrawal, All Flats Second Handling	3.57	4.33	Flats	TPH	-
64	Second Handling, Mixed, Pref	3.57	4.33	Flats	TPH	+
65	Originating Std	4.83	4.91	Flats	FHP	+
66	Opening Unit, Mixed Std	4.36	4.71	Flats	FHP	+
67	Inventory, Opening Unit, Mixed Std	4.36	4.71	Flats	FHP	+
68	Console Reading (Pieces Fed)	1	1	Flats	INVALID	+
69	Carrier Bypass	1	1	Flats	INVALID	+
70	Outside Piece	1	1	Parcels	FHP	+
71	Sacks	8.79	8.79	Parcels	FHP	+
72	Hampers	39.7	39.7	Parcels	FHP	+
73	Hampers - Extended	65	65	Parcels	FHP	+
74	Inventory - Hampers	39.7	39.7	Parcels	FHP	+
75	Originating Presort, Pref	1	1	Letters	INVALID	+
76	Originating Presort, Std	1	1	Letters	INVALID	+
77	Originating Presort, Pref	1	1	Flats	INVALID	+
78	Originating Presort, Std	1	1	Flats	INVALID	+
79	Parcels for Delivery	1	1	Parcels	FHP	+
80	Machine Canceled	35.51	41.74	Letters	FHP	+
81	Metered Preparation, Pref	27.88	30.43	Letters	FHP	+
82	Metered Bypass, Pref	28.25	31.2	Letters	FHP	+
83	Metered BBM	22.22	22.9	Letters	FHP	+
84	Metered Bypass Std	19.6	22.9	Letters	FHP	+
85	Opening Unit, Pref	28.55	35.42	Letters	FHP	+
86	Opening Unit, Std	18.11	19.48	Letters	FHP	+
87	Metered Bypass Pref	15.07	15.97	Letters	FHP	+
88	Metered Bypass, Std	14.14	19.1	Letters	FHP	+
89	Opening Unit, Std	13.57	15.9	Letters	FHP	+
90	Machine Canceled	4.72	4.91	Flats	FHP	+
91	Metered Preparation	4.18	4.22	Flats	FHP	+
92	Metered Bypass	4.49	4.22	Flats	FHP	+
93	Originating, Std	4.83	4.91	Flats	FHP	+
94	AFCS-ISS Script Image Lift	1	1	Letters	INVALID	+
95	AFCS-ISS OCR Readable Image Lift	1	1	Letters	INVALID	+
96	INVALID	1	1	Letters	INVALID	+
97	INVALID	1	1	Letters	INVALID	+
98	INVALID	1	1	Letters	INVALID	+
99	Workload Unit	1	1	Workload Unit	INVALID	+



UNITED STATES POSTAL SERVICE
475 L'ENFANT PLAZA SW
WASHINGTON DC 20260

April 22, 1994

**MEMORANDUM FOR MANAGERS, IN-PLANT SUPPORT
PROCESSING AND DISTRIBUTION**

Some time ago, it was requested that Headquarters develop a standardized list of conversion factors for the various types of mail and containers that are not covered by the Handbook M-32, Management Operating Data System. This effort resulted in a preliminary package that was sent to you in February requesting comments and suggestions.


Seven Areas responded to our request, and based on the feedback that we received, adjustments have been made to the conversion factors for bundles into SPBS trays, OTR containers and gurnies. We also made an adjustment to the number of third-class flats in a bundle. Attached you will find the conversion tables that resulted from your review.

We have provided two separate lists--the first one is by processing type and the second one is by class of mail. Both lists contain the exact same material, just sorted differently, for ease of use. The reference to a hamper is the 1046 hamper and the reference to the sack is the average sack utilized for that class of mail. In some cases the sack is the average of a combination of #1 and #2 sack or the average of a #2 or #3 sack. Again, these conversion factors are to be utilized as a supplement to the M-32 Handbook and should not be construed as a replacement. Actual counts or MODS weights should be used whenever possible.

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We are requesting that all Processing & Distribution Centers and Facilities use this list starting no later than A/P 09 (April 30). Any questions that you may have regarding these conversion factors may be addressed to Bernie Opitz of my staff at (202) 268-6291.

Your continued support and cooperation in this matter is greatly appreciated.


Michele Denny, Manager
Service Policies and Programs
Processing and Distribution

Attachments

cc: Mr. Jacobson
Mr. Hunter
Mr. Potter
Area Managers, Processing & Distribution

**Mail Condition Reporting System (MCRS)
 Conversion Rates - Not Covered by the M-32
 Sorted by Processing Type**

<i>Description</i>	<i>Pieces /</i>	<i>Item</i>
1C Letters	43	Bundle
2C Letters	23	"
3C Letters	19	"
1C Flats	18	Bundle
2C Flats	14	"
3C Flats	20	"
1C Ltr Bndls	89	U-Cart
2C Ltr Bndls	88	"
3C Ltr Bndls	96	"
1C Flt Bndls	31	U-Cart
2C Flt Bndls	35	"
3C Flt Bndls	41	"
1C Ltr Bndls	272	Hamper
2C Ltr Bndls	193	"
3C Ltr Bndls	278	"
1C Flt Bndls	118	Hamper
2C Flt Bndls	95	"
3C Flt Bndls	122	"
1C Ltr Bndls	29	SPBS Tray
2C Ltr Bndls	35	" "
3C Ltr Bndls	31	" "
1C Flt Bndls	18	SPBS Tray
2C Flt Bndls	14	" "
3C Flt Bndls	16	" "
1C SPRs	33	SPBS Tray
2C SPRs	30	" "
3C SPRs	28	" "
1C Ltr Bndls	21	Sack
2C Ltr Bndls	17	"
3C Ltr Bndls	19	"
1C Flt Bndls	11	Sack
2C Flt Bndls	8	"
3C Flt Bndls	11	"

Description	Pieces /	Item
1C Priority	74	U-Cart
1C Priority	92	Hamper
1C Priority	20	Sack
1C Priority	19	SPBS Tray
1C Ltr Bndls	90	Mixed Hamper
2C Ltr Bndls	99	" "
3C Ltr Bndls	97	" "
1C Flt Bndls	30	Mixed Hamper
2C Flt Bndls	66	" "
3C Flt Bndls	67	" "
1C SPRs	210	Mixed Hamper
2C SPRs	156	" "
3C SPRs	122	" "
1C Ltr Bndls	19	Mxd SPBS Tray
2C Ltr Bndls	33	"
3C Ltr Bndls	20	"
1C Flt Bndls	10	Mxd SPBS Tray
2C Flt Bndls	12	"
3C Flt Bndls	13	"
1C SPRs	31	Mxd SPBS Tray
2C SPRs	26	"
3C SPRs	18	"
1C Ltr Bndls	11	Mxd Sack
2C Ltr Bndls	15	" "
3C Ltr Bndls	19	" "
1C Flt Bndls	6	Mxd Sack
2C Flt Bndls	14	" "
3C Flt Bndls	12	" "
1C SPRs	30	Mxd Sack
2C SPRs	13	" "
3C SPRs	41	" "
1C Ltr Bndls	186	Mxd Wiretainer
2C Ltr Bndls	111	" "
3C Ltr Bndls	263	" "
1C Flt Bndls	106	Mxd Wiretainer
2C Flt Bndls	144	" "
3C Flt Bndls	179	" "

<i>Description</i>	<i>Pieces /</i>	<i>Item</i>
1C SPRs	288	Mxd Wiretainer
2C SPRs	194	" "
3C SPRs	128	" "
1C Bundles	177	Pallet
2C Bundles	168	"
3C Bundles	219	"
1C Sacks	34	Pallet
2C Sacks	40	"
3C Sacks	45	"
1C Sacks	31	Nutting Truck
2C Sacks	38	" "
3C Sacks	34	" "
1C Bundles	41	GPMC/APC
2C Bundles	84	"
3C Bundles	86	"
1C Bundles	85	OTR Container
2C Bundles	83	" "
3C Bundles	84	" "
1C Bundles	41	Gurney (1033)
2C Bundles	58	"
3C Bundles	43	"
1C Sacks	31	GPMC/APC
2C Sacks	36	"
3C Sacks	31	"
1C Sacks	50	OTR Container
2C Sacks	59	" "
3C Sacks	53	" "
1C Sacks	7	Gurney (1033)
2C Sacks	14	"
3C Sacks	11	"
1C SPRs	101	U-Cart

**Mail Condition Reporting System (MCRS)
 Conversion Rates - Not Covered by the M-32
 Sorted by Class of Mail (First-Class)**

<i>Description</i>	<i>Pieces /</i>	<i>Item</i>
1C Priority	74	U-Cart
1C Priority	92	Hamper
1C Priority	20	Sack
1C Priority	19	SPBS Tray
1C Letters	43	Bundle
1C Flats	18	Bundle
1C Ltr Bndls	21	Sack
1C Flt Bndls	11	Sack
1C Ltr Bndls	89	U-Cart
1C Flt Bndls	31	U-Cart
1C Ltr Bndls	272	Hamper
1C Flt Bndls	118	Hamper
1C Ltr Bndls	29	SPBS Tray
1C Flt Bndls	18	SPBS Tray
1C SPRs	33	SPBS Tray
1C Ltr Bndls	90	Mixed Hamper
1C Flt Bndls	30	Mixed Hamper
1C SPRs	210	Mixed Hamper
1C Ltr Bndls	19	Mxd SPBS Tray
1C Flt Bndls	10	Mxd SPBS Tray
1C SPRs	31	Mxd SPBS Tray
1C Ltr Bndls	11	Mxd Sack
1C Flt Bndls	6	Mxd Sack
1C SPRs	30	Mxd Sack
1C Ltr Bndls	186	Mxd Wiretainer
1C Flt Bndls	106	Mxd Wiretainer
1C SPRs	288	Mxd Wiretainer
1C Bundles	177	Pallet
1C Bundles	41	GPMC/APC
1C Bundles	85	OTR Container
1C Bundles	41	Gurney (1033)
1C Sacks	34	Pallet
1C Sacks	31	Nutting Truck
1C Sacks	31	GPMC/APC
1C Sacks	50	OTR Container
1C Sacks	7	Gurney (1033)
1C SPRs	101	U-Cart

**Mail Condition Reporting System (MCRS)
 Conversion Rates - Not Covered by the M-32
 Sorted by Class of Mail (Second-Class)**

<i>Description</i>	<i>Pieces /</i>	<i>Item</i>
2C Letters	23	Bundle
2C Flats	14	Bundle
2C Ltr Bndls	17	Sack
2C Flt Bndls	8	Sack
2C Ltr Bndls	88	U-Cart
2C Flt Bndls	35	U-Cart
2C Ltr Bndls	193	Hamper
2C Flt Bndls	95	Hamper
2C Ltr Bndls	35	SPBS Tray
2C Flt Bndls	14	SPBS Tray
2C SPRs	30	SPBS Tray
2C Ltr Bndls	99	Mixed Hamper
2C Flt Bndls	66	Mixed Hamper
2C SPRs	156	Mixed Hamper
2C Ltr Bndls	33	Mxd SPBS Tray
2C Flt Bndls	12	Mxd SPBS Tray
2C SPRs	26	Mxd SPBS Tray
2C Ltr Bndls	15	Mxd Sack
2C Flt Bndls	14	Mxd Sack
2C SPRs	13	Mxd Sack
2C Ltr Bndls	111	Mxd Wiretainer
2C Flt Bndls	144	Mxd Wiretainer
2C SPRs	194	Mxd Wiretainer
2C Bundles	168	Pallet
2C Bundles	84	GPMC/APC
2C Bundles	83	OTR Container
2C Bundles	58	Gurney (1033)
2C Sacks	40	Pallet
2C Sacks	38	Nutting Truck
2C Sacks	36	GPMC/APC
2C Sacks	59	OTR Container
2C Sacks	14	Gurney (1033)

**Mail Condition Reporting System (MCRS)
 Conversion Rates - Not Covered by the M-32
 Sorted by Class of Mail (Third-Class)**

<i>Description</i>	<i>Pieces /</i>	<i>Item</i>
3C Letters	19	Bundle
3C Flats	20	Bundle
3C Ltr Bndls	19	Sack
3C Flt Bndls	11	Sack
3C Ltr Bndls	96	U-Cart
3C Flt Bndls	41	U-Cart
3C Ltr Bndls	278	Hamper
3C Flt Bndls	122	Hamper
3C Ltr Bndls	31	SPBS Tray
3C Flt Bndls	16	SPBS Tray
3C SPRs	28	SPBS Tray
3C Ltr Bndls	97	Mixed Hamper
3C Flt Bndls	67	Mixed Hamper
3C SPRs	122	Mixed Hamper
3C Ltr Bndls	20	Mxd SPBS Tray
3C Flt Bndls	13	Mxd SPBS Tray
3C SPRs	18	Mxd SPBS Tray
3C Ltr Bndls	19	Mxd Sack
3C Flt Bndls	12	Mxd Sack
3C SPRs	41	Mxd Sack
3C Ltr Bndls	263	Mxd Wiretainer
3C Flt Bndls	179	Mxd Wiretainer
3C SPRs	128	Mxd Wiretainer
3C Bundles	219	Pallet
3C Bundles	86	GPMC/APC
3C Bundles	84	OTR Container
3C Bundles	43	Gurney (1033)
3C Sacks	45	Pallet
3C Sacks	34	Nutting Truck
3C Sacks	31	GPMC/APC
3C Sacks	53	OTR Container
3C Sacks	11	Gurney (1033)

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-5 Please describe any weight information that is routinely collected on mail processing operations (e.g., MODS, PIRS) and explain how it is used.

Response:

The weight information collected on mail processing operations is used to convert to pieces. Mail volume is recorded in the operations where it receives its first distribution handling, referred to as the first handling pieces (FHP) count. A first handling piece, whether letter, flat, or parcel, represents the number of pieces of mail received for initial distribution in a facility. FHP is an indicator of the processing and distribution workload of the facility. First handling pieces are determined either by machine meter counts or by national conversion rates. See attachments to ADVO/USPS-3(a).

To determine FHP, multiply the number of pounds of mail weighed to the operation by a standard national conversion rate of the number of pieces per pound of mail.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO, INC.**

ADVO/USPS-6. Please describe any weight information that is routinely collected on city delivery carrier operations and explain how it is used.

RESPONSE:

No such data are routinely collected.

Response of United States Postal Service
To Interrogatories of ADVO

ADVO/USPS-8. In Docket R97-1, witness Degen (USPS-T-12) indicated that workload measures for Allied Operations were being collected. Please provide the following:

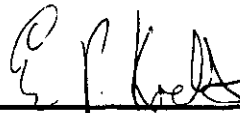
- a. Identification of each type of "allied operation" for which data were being collected
- b. A description of the workload measures that were being collected for each type of "allied operation".
- c. An explanation of the status of that data collection,

ADVO/USPS-8 Response.

- a. Data (not otherwise collected routinely by the Postal Service) were collected for the MODS Platform cost pool as part of a special study performed by Christensen Associates (note that this is a separate study from that documented in USPS-LR-I-115). Additionally, data (from existing Postal Service data systems) to augment that employed by witness Bradley in Docket No. R97-1, USPS-T-14 were compiled for the MODS Platform, Opening ("Pref" and Bulk Business Mail) and Pouching cost pools.
- b. See USPS-T-15 at page 138 and witness Bozzo's response to MPA/USPS-T-15-1.
- c. The data collection for the special study pertaining to the MODS Platform cost pool, described in the response to part (a), has been completed.

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 "Eric P. Koetting", written over a solid horizontal line.

Eric P. Koetting

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April 6, 2000