

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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER  
TO INTERROGATORY AAP/USPS-T37-7

The United States Postal Service hereby provides the revised response of  
witness Kiefer to interrogatory AAP/USPS-T37-7, originally filed on March 14, 2000.

The revision incorporates a revision made by witness Crum on April 14.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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April 26, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER  
TO INTERROGATORIES OF THE ASSOCIATION OF AMERICAN PUBLISHERS  
(REVISED APRIL 26, 2000**

**AAP/USPS-T37-7** At footnote 13 of page 33 of your testimony, you state that “[w]ith elimination of the Local zone, all mail formerly paying the Local rate would fall into the Zones 1&2 rate category, unless prepared and entered as DDU mail.” With respect to this statement:

- (a) Has the Postal Service estimated the number of pieces of BPM in the test year that formerly paid the Local rate but will now pay the Zone 1&2 rate because they cannot achieve the preparation requirements necessary for any Destination Delivery Unit (“DDU”) discounts?
- (b) If the answer is yes to subpart (a) of this interrogatory is yes, please provide this estimate, explain how the piece volume estimate was derived and identify all studies, reports, data or other evidence upon which such estimate was based.

**RESPONSE**

- (a) No. However, the Postal Service has a study that indicates where BPM mail paying the Local rate is currently deposited. See Attachment to response to AAP/USPS-T37-7. Approximately 49% is currently entered at DDU, 44% at DSCF and 1% at DBMC. Only 5.2% is entered at locations where the Zones 1&2 rate would apply. The question has also called to my attention an inaccuracy in Footnote 13; in addition to the DDU rate, mail currently paying the Local rate can also potentially be prepared and entered as DSCF or DBMC mail. An erratum correcting Footnote 13 is being filed to include these other rate options for Local rate mail.
- (b) Please see Attachment H, Table 1 (Revised April 14, 2000) to the testimony of USPS witness Charles Crum (USPS-T-27) which presents the study finding cited in subpart (a).

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Entry Location for Current Local Rate Mail  
(Source: USPS-T-27, Attachment H, Table 1, Revised April 14, 2000)

DDU	49.2%
Other DU	5.2%
DSCF	44.4%
DBMC	1.2%

**DECLARATION**

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

A handwritten signature in cursive script that reads "James M. Kiefer". The signature is written over a solid horizontal line.

Dated: 4-26-2000

## 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.

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Scott L. Reiter

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