

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO MPA INTERROGATORY  
(MPA/USPS-T13-36)

The United States Postal Service hereby provides the revised response of witness Raymond to the following interrogatory of the Magazine Publishers of America: MPA/USPS-T13-36, filed on February 17, 2000. This version of the response conforms to the detailed description of the ES term "Finger@Delivery" contained in the response filed on May 23, 2000 to ADVO/USPS-T13-124.

Each 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

  
Richard T. Cooper

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June 2, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
REVISED 6/2/00

MPA/USPS-T13-36. Please refer to your Testimony, at page 11, lines 21 - 22, and levels 11.4 and 11.4.1. Please define the terms "Finger @ Delivery" and "1-Handed Slam." Please state whether it is possible to conduct a 1-Handed Slam while fingering the mail. Please explain how a 1-Handed Slam and fingering the mail at delivery are associated with reaching into the satchel to retrieve mail.

RESPONSE:

Level 11.4 contains the activity of, Finger @ Delivery, which are the actions of the carrier obtaining the mail while at the delivery point from the hand, and/or arm, and/or satchel, verifying the mail, and collecting the mail from the arm and/or satchel before depositing the mail in the receptacle or at a drop.

Level 11.4.1 contains the 1-Hand Slam which is a description of a type of mailbox where the carrier can in a upward sweeping motion open the mailbox and deposit the mail in a single downward motion.

# DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond  
Date: 6-2-00

## 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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