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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS L. PAUL LOETSCHER TO INTERROGATORY OF
MAGAZINE PUBLISHERS OF AMERICA, INC. (MPA/USPS–T41–1)

The United States Postal Service hereby files the response of witness L. Paul

Loetscher to the following interrogatory of the Magazine Publishers of America, Inc.:

MPA/USPS–T41–1, filed on October 4, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 18, 2001

MPA/USPS–T41-1:

Table 2 of USPS-LR-J-114 disaggregates Periodicals Outside-County mail volume, weight, and number of containers by entry facility type, container type, and container size. Using the data used to produce Table 2, please provide an estimate of the number of Periodicals Outside-County sacks there are by sack size (i.e., number of pieces in sack), sack presort level, and entry facility. If the study did not collect enough detail to provide such an estimate, please provide an estimate of the number of sacks by sack size and sack presort level using the most recent data available. Please also describe the data source you used to develop the estimate.

RESPONSE:

Table 2 of LR-J-114 does not disaggregate Periodicals Outside-County mail volume, weight and number of containers by entry facility, container type and container size.

Table 2 of LR-J-114 disaggregates Periodicals Outside-County mail volume, weight and number of containers by entry facility type, container type and container presort level.

The study presented in LR-J-114 did not collect the data needed to estimate the distribution of sacks by size, presort level and entry facility. To provide an estimate, the study presented in LR-I-87/R2000-1 is used to estimate the FY1999 distribution of sacks by sack size and presort level. This distribution is then applied to the estimated sack counts presented in LR-J-114. The results are presented in Table 1 - MPA/USPS-T41-1. As preparation rules have changed since LR-I-87/R2000-1 was conducted, the distribution here may not be reflective of the current distribution of sack sizes.

Table 1 - MPA/USPS-T41-1

Distribution of Sacks by sack Size
LR-J-114 Sack Estimate distributed based on LR-I-87 Sack Distribution

Sacks from LR-J-114	5,819,875	10,134,157	37,737,042	29,481,326	3,822,061	10,443,966	3,564,127
Pieces/Sack	CR Sack	CRTS Sack	5-D Sack	3-D Sack	SCF Sack	ADC Sack	MADC Sack
1	1,406	0	155,672	74,008	95	45,822	79,349
2	242,064	0	26,599	206,439	1,079	78,442	112,896
3	2,912	0	23,933	42,165	232	78,668	119,389
4	2,764	271	656,663	22,527	157	53,020	72,792
5	2,170	0	484,494	77,013	775	36,436	52,734
6	1,190,618	461,060	3,003,704	1,378,601	33,169	624,178	60,310
7	496,765	147,127	1,074,935	696,255	44,670	486,708	69,689
8	356,445	20,281	1,191,376	797,018	52,227	376,040	79,346
9	297,232	158,961	890,575	832,367	28,572	363,845	49,364
10	177,481	22,986	639,202	582,038	16,501	232,832	82,375
11	219,769	66,300	449,451	449,603	14,871	261,791	45,111
12	203,442	476,063	452,830	542,222	18,934	333,560	11,549
13	33,696	207,254	5,632,106	523,947	31,669	212,902	12,417
14	19,185	141,571	1,414,818	546,555	38,680	310,806	12,215
15	27,039	147,110	3,364,505	308,967	22,020	254,347	45,359
16	75,105	85,920	1,704,074	343,813	26,699	133,966	24,389
17	33,524	44,145	2,226,138	380,590	19,551	105,193	42,089
18	16,263	202,380	296,117	144,020	16,029	203,383	35,940
19	72,018	929,153	1,091,421	230,317	19,876	91,810	31,202
20	82,360	336,080	343,569	278,673	36,386	82,591	43,902
21	7,368	90,262	2,204,886	290,147	27,101	98,500	6,061
22	12,624	389,500	831,208	286,785	49,273	108,582	38,626
23	3,664	833,336	112,004	487,089	36,752	76,436	37,471
24	223,979	186,473	1,131,626	903,963	106,543	231,385	30,373
25	198,894	40,862	887,072	749,655	232,640	247,956	29,564
26	106,070	281,610	255,597	905,975	311,696	397,810	34,521
27	162,792	151,015	644,552	511,053	263,482	208,319	34,527
28	22,533	435,099	165,145	794,755	172,162	241,863	36,280
29	190,858	34,078	124,936	654,800	233,419	158,595	26,146
30	20,675	456,095	723,015	551,383	119,903	170,149	12,173
31	57,947	186,217	834,328	436,076	106,660	196,978	9,002
32	2,868	181,264	240,057	420,623	176,365	222,596	17,380
33	121,810	300,025	712,474	313,816	71,766	94,063	40,125
34	7,487	632,011	132,654	567,475	132,475	175,374	26,263
35	37,973	26,146	161,906	198,935	104,236	310,567	30,913
36	15,001	138,228	180,326	840,629	123,012	210,294	47,660
37	27,419	3,405	117,758	218,920	74,039	90,184	34,330
38	2,405	76,467	287,380	598,634	107,707	121,611	26,151
39	12,699	312,215	890,085	345,513	50,723	219,723	13,233
40	2,095	264,477	291,838	297,544	40,130	95,018	21,889
41	30,477	2,506	169,159	370,386	96,723	216,113	18,157
42	1,943	4,360	27,187	563,995	81,290	114,718	15,679
43	3,183	31,442	310,167	234,405	72,612	67,704	3,688
44	12,895	327,096	70,129	261,684	20,818	91,718	36,899
45	987	16,100	113,344	371,963	40,059	46,085	21,775
46	17,781	12,489	27,604	295,156	35,341	70,428	11,918
47	1,197	10,281	35,608	343,941	37,471	57,042	37,169
48	25,214	989	46,145	77,793	26,013	133,413	19,353
49	936	82,316	53,387	291,504	33,938	70,801	11,789
50	180,351	74,928	128,757	219,947	28,296	68,160	13,650
51	16,746	110,035	7,964	135,774	41,964	42,600	50,135
52	15,308	11,184	6,016	461,182	14,266	55,267	7,260
53	26,121	6,407	10,223	261,885	32,391	55,001	16,606
54	58,688	4,013	23,901	106,140	12,789	16,170	31,417
55	11,707	8,809	61,677	132,851	20,687	62,179	26,818
56	4,833	875	78,226	129,795	18,017	24,153	57,707
57	545	7,132	30,382	244,696	33,449	64,195	30,916
58	467	68,673	4,265	249,684	4,872	164,733	60,773
59	299	28,481	39,715	86,996	8,989	25,640	15,027
60	84,050	2,635	13,637	119,714	19,916	111,906	33,791
61	226,054	1,188	19,710	97,356	7,816	42,257	40,079
62	638	189,379	9,197	86,114	6,688	26,689	60,561
63	418	869	3,082	78,353	14,368	22,454	12,631
64	707	603	13,085	142,566	16,583	31,874	17,814
65	1,136	1,424	1,770	214,121	3,908	16,690	4,179
66	241	913	20,974	267,024	2,673	96,780	3,958
67	315	930	2,695	68,791	3,047	14,120	6,015
68	267	671	1,645	153,352	729	28,730	3,876
69	6,202	931	58,137	113,122	10,220	25,912	8,434
70	404	802	1,264	207,966	16,607	16,832	28,861
71	428	7,059	4,218	142,386	8,241	16,011	9,453
72	229	810	835	60,555	31	19,971	21,631
73	348	11,949	8,741	79,719	388	15,157	9,098
74	440	1,078	16,985	32,824	1,292	7,311	33,263
75	313	919	60,532	133,679	1,628	28,472	21,710
76	6,186	6,870	10,978	258,566	147	55,791	19,601
77	428	7,259	66,767	41,722	878	37,629	8,346
78	296	1,200	25,731	280,558	158	5,607	19,021
79	29,475	853	7,446	207,559	0	31,031	37,617
80	257	1,458	5,490	115,081	4,494	25,107	27,667
81	436	1,716	410	14,465	3,666	16,887	7,754
82	395	1,077	553	15,512	63	21,943	17,687
83	3,141	29,974	58,544	153,046	781	5,666	13,435
84	6,646	16,643	909	84,006	4,048	23,708	44,210
85	381	595	421	69,211	1,024	5,330	17,956
86	370	4,561	4,959	79,749	144	24,688	10,174
87	273	330	637	60,611	23	23,643	7,340
88	97,389	189	272	36,435	54	7,390	29,620
89	13,161	283	5,122	23,884	31	13,122	13,012
90	224	459	192	236,214	0	617	8,806
91	25,458	4,159	479	76,671	17	14,019	18,474
92	97,374	231	6,739	12,124	46	2,234	6,936
93	359	304	479	10,561	1,908	2,267	8,797
94	201	99,374	340	34,490	0	3,766	21,933

95	163	2,589	239	114,803	686	3,115	19,544
96	225	256	335	124,471	807	1,067	18,079
97	241	726	376	48,338	96	1,534	15,975
98	353	230	217	54,073	193	2,117	15,705
99	251	131	46	42,229	23	5,205	14,680
100	202	442	536	105,617	0	1,772	24,130
101	214	4,422	172	17,582	0	375	4,596
102	196	15,722	167	24,075	196	7,449	5,716
103	219	196	125	24,511	0	3,879	10,762
104	152	451	108	24,108	0	24,266	4,826
105	259	322	345	31,287	1,920	9,983	6,505
106	239	577	114	27,162	0	241	20,290
107	586	3,397	126	3,345	0	24,380	10,353
108	323	16,073	25,866	49,537	0	12,848	47,666
109	354	139	175	50,330	0	288	3,718
110	242	214	423	22,554	0	195	1,880
111	277	19,427	82,092	5,433	0	1,424	10,293
112	1,242	208	64	4,155	0	2,580	13,652
113	191	284	53	14,390	0	1,109	5,151
114	211	299	33	9,388	0	2,536	10,760
115	127	335	362	42,914	362	9,514	10,832
116	192	142	15,687	2,198	98	7,552	13,389
117	125	2,213	131	13,111	0	517	2,670
118	220	102,105	496	11,114	0	165	2,255
119	184	171	20	1,574	0	1,917	3,022
120	216	290	13,216	2,995	0	165	2,438
121	93	2,083	19	1,965	0	3,656	2,108
122	75	161	77	2,609	0	119	850
123	111	239	355	1,134	96	219	5,489
124	138	248	26	1,631	0	2,613	2,298
125	121	30,078	17	35,785	0	75	31,471
126	153	64	131	30,284	0	50	4,960
127	90	80	451	2,657	0	133	2,562
128	183	0	269	26,048	0	50	19,530
129	277	283	173	1,992	0	25	29,492
130	157	86	29	1,669	0	129	3,444
131	81	5	26	9,947	98	1,421	4,917
132	183	77	40	13,585	0	230	1,570
133	1,412	29,741	105	49,555	0	155	4,083
134	190	79	0	2,441	0	102	4,149
135	177	85	126	54,200	0	75	2,732
136	55	64	107	1,494	0	79	29,899
137	41	186	11	2,610	0	79	1,862
138	96	114	257	47,129	0	79	7,321
139	84	190	86	1,570	0	25	10,187
140	125	66	8	31,195	0	159	3,145
141	143	51	6	10,911	0	29	7,053
142	123	190	29	8,063	0	79	5,094
143	80	56,986	11	1,865	232	201	5,114
144	100	105	30	1,263	0	129	2,571
145	30	182	30	3,007	0	184	1,911
146	101	520	17	1,088	0	963	4,961
147	96	130	16	9,528	0	79	1,511
148	50	24	0	1,287	0	266	3,407
149	70	26	8	8,485	0	25	2,081
150	73	374	11	1,215	0	235	77,519
151	50	118	234	1,084	0	0	492
152	40	30	28	5,903	0	0	3,169
153	91	145	4,278	1,043	0	79	1,658
154	70	100	6	1,124	0	50	5,453
155	220	518	8	2,613	0	79	661
156	90	495	0	80,682	0	79	5,128
157	50	99	25	81,451	0	25	1,946
158	60	149	0	956	0	36	3,066
159	20	184	19	31,768	0	0	3,157
160	40	41	8	1,150	0	1,626	3,443
161	70	30	8	31,044	218	79	3,507
162	20	179	0	5,740	0	0	681
163	30	52	24	905	0	118	4,650
164	30	117	0	1,930	0	0	1,546
165	30	48	699	1,529	0	79	489
166	45	137	0	633	0	0	13,373
167	30	13	8	451	0	0	1,579
168	30	3,744	0	692	0	0	9,671
169	31	81	0	603	0	0	5,472
170	41	2,893	9	670	0	0	586
171	10	129	24	1,011	0	79	526
172	0	21	8	772	0	155	14,262
173	21	56,826	0	1,497	0	0	3,636
174	51	0	435	41,876	0	0	731
175	0	13	0	3,476	0	79	3,828
176	10	26	0	368	0	0	514
177	0	61	0	780	0	0	26
178	10	118	0	287	0	0	3,262
179	25	105	0	322	0	0	397
180	10	52	8	6,084	0	79	6,109
181	30	58	0	250	0	0	3,233
182	0	253	0	369	0	0	199
183	20	158	8	53,966	0	0	8,872
184	20	52	0	137	0	163	693
185	0	153	0	176	0	0	276
186	0	125	0	1,279	0	79	5,411
187	20	48	0	407	0	241	15,323
188	40	52	0	217	0	76	579
189	50	63	8	405	0	0	361
190	30	8,914	0	419	0	159	372
191	30	158	9	204	0	0	586
192	10	56,828	11	274	0	0	2,877
193	60	176	8	285	0	79	779
194	10	105	19	53,659	0	0	4,290
195	20	52	0	246	0	0	507
196	50	243	11	19,320	0	0	1,533
197	0	66	0	37,941	0	159	530

198	8	52	8	306	0	79	80
199	40	0	0	370	0	0	1,380
200	10	105	0	19,465	0	79	4,734
201	15	105	0	476	0	79	26
202	0	52	0	14,797	0	0	729
203	10	0	0	44,629	0	24	1,032
204	0	158	0	608	0	109	3,296
205	10	0	0	420	0	79	581
206	0	55	0	24,067	0	0	3,613
207	20	118	0	201	0	0	649
208	10	108	0	215	0	79	1,399
209	0	0	0	93	0	0	0
210	10	66	11	53,736	0	0	548
211	0	210	0	7,941	0	0	0
212	0	13	8	75	0	79	102
213	0	170	0	76	0	0	102
214	0	105	0	8	0	0	0
215	10	0	0	234	0	0	3,414
216	10	105	0	181	0	0	908
217	0	0	0	1,392	0	0	977
218	0	52	8	2,505	0	0	402
219	0	52	0	80	0	30	433
220	0	52	0	19	0	0	1,348
221	0	52	0	57	0	103	38
222	0	105	0	132	0	0	1,050
223	0	105	0	10	0	0	80
224	0	0	0	254	0	79	0
225	20	0	0	10	0	0	1,721
226	0	52	95	224	0	0	717
227	0	52	0	48	0	0	0
228	0	1,900	0	36	0	0	80
229	0	0	61	84	0	0	395
230	0	0	0	84	0	0	0
231	0	66	0	51	0	0	0
232	0	52	0	93	0	0	487
233	0	105	0	70	0	146	1,364
234	0	5	8	176	0	0	211
235	0	0	0	11	0	0	11
236	0	1,945	8	20	0	0	395
237	0	21	0	165	471	0	395
238	0	52	0	15	0	79	92
239	0	52	0	107	0	79	475
240	0	0	0	43	0	0	3,647
241	0	52	0	327	0	0	392
242	0	13	0	152	0	0	80
243	0	52	0	107	0	0	1,820
244	0	1,951	0	7,237	0	0	11
245	0	0	0	71	0	0	0
246	0	0	0	7,964	0	0	0
247	0	158	0	362	0	0	1,805
248	0	0	0	166	0	0	20
249	0	0	0	0	0	0	64
250	0	0	0	8	0	0	717
251	0	0	0	0	0	0	405
252	0	0	0	0	0	0	0
253	0	0	0	10	0	0	102
254	0	0	0	3,277	0	0	102
255	0	0	0	14	0	79	102
256	0	52	427	95	0	0	0
257	0	0	0	17	0	0	0
258	0	52	0	8	0	79	0
259	0	0	8	0	0	0	1,946
260	0	52	8	0	0	0	0
261	0	0	0	14	0	79	1,820
262	0	52	0	15	0	0	2,045
263	0	105	0	23,079	0	79	0
264	0	0	0	3,265	0	0	395
265	0	52	0	27	0	0	53
266	0	0	0	14	0	0	37
267	0	0	0	8	0	0	2,212
268	0	52	0	8	0	0	121
269	0	0	0	3,689	0	0	0
270	0	13	0	0	0	0	392
271	0	114	8	0	0	0	0
272	0	0	0	15	0	0	0
273	0	0	0	7,237	0	0	0
274	0	52	0	17	0	79	898
275	0	52	0	464	0	0	0
276	0	0	0	3,689	0	0	85
277	0	0	0	14	0	79	506
278	0	13	1,438	0	0	0	1,820
279	0	52	0	38	0	0	0
280	0	52	0	13,962	0	0	609
281	0	0	0	8	0	0	0
282	0	13	0	14	0	0	1,820
283	0	66	0	1,324	0	0	0
284	0	0	0	19	0	0	0
285	0	0	0	8	0	0	0
286	0	0	0	14	0	0	0
287	0	0	0	8	0	0	12
288	0	52	0	0	0	0	3,677
289	0	0	0	76	0	79	0
290	0	0	0	8	0	0	0
291	0	0	0	5,429	0	79	37
292	0	0	0	0	0	0	235
293	0	0	0	0	0	0	37
294	0	13	0	0	0	0	195
295	0	0	0	8	0	0	1,658
296	0	0	0	0	0	0	0
297	0	52	0	8	0	0	195
298	0	0	0	8	0	0	0
299	0	52	0	0	0	0	0
300	0	0	0	8	0	0	0

301	0	0	0	0	0	0	6
302	0	0	0	0	0	0	11
303	0	0	0	0	0	0	0
304	0	0	0	2,488	0	0	0
305	0	0	0	8	0	0	0
306	0	52	0	0	0	0	392
307	0	0	0	89	0	0	0
308	0	13	0	0	0	0	0
309	0	13	0	1,903	0	0	163
310	0	52	0	5,437	0	0	1,041
311	0	0	0	20	0	0	0
312	0	0	0	0	0	0	0
313	0	0	0	1,175	0	0	0
314	0	0	0	19	0	0	0
315	0	1,882	0	1,249	0	0	0
316	0	0	0	76	0	0	0
317	0	52	0	0	0	0	8
318	0	52	0	0	0	0	0
319	0	0	0	0	0	0	0
320	0	0	0	0	0	0	430
321	0	52	0	14	0	0	784
322	0	0	0	0	0	0	612
323	0	0	0	0	0	0	0
324	0	0	0	0	0	0	0
325	0	13	0	0	0	0	37
326	0	0	0	0	0	0	0
327	0	0	0	8	0	0	0
328	0	0	0	8	0	0	0
329	0	0	0	0	0	0	0
330	0	0	0	0	0	0	0
331	0	52	0	0	0	0	0
332	0	0	0	0	0	0	0
333	0	105	0	19	0	0	0
334	0	0	0	76	0	0	0
335	0	52	0	27	0	0	0
336	0	0	0	8	0	0	0
337	0	0	0	8	0	0	0
338	0	0	0	0	0	0	0
339	0	0	0	0	0	0	2,342
340	0	0	0	76	0	0	42
341	0	0	0	0	0	0	195
342	0	52	0	1,271	0	159	0
343	0	0	0	0	0	0	0
344	0	0	0	0	0	0	308
345	0	0	0	0	0	0	275
346	0	0	0	8	0	0	0
347	0	0	0	0	0	0	0
348	0	0	0	19	0	0	0
349	0	0	0	27	0	0	228
350	0	0	0	227	0	0	0
351	0	0	0	0	0	0	0
352	0	0	0	0	0	0	0
353	0	0	0	8	0	0	0
354	0	52	0	0	0	0	0
355	0	0	0	8	0	0	0
356	0	0	0	8	0	0	0
357	0	0	0	0	0	0	0
358	0	0	0	0	0	0	0
359	0	52	0	15	0	0	0
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361	0	0	0	0	0	0	0
362	0	0	0	8	0	0	0
363	0	52	0	0	0	0	0
364	0	52	0	0	0	0	0
365	0	0	0	0	0	0	0
366	0	0	0	0	0	0	0
367	0	0	0	0	0	0	0
368	0	0	0	8	0	0	195
369	0	0	0	0	0	0	0
370	0	0	0	0	0	0	0
371	0	0	0	0	0	0	0
372	0	0	0	0	0	0	0
373	0	0	0	0	0	0	0
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375	0	0	0	0	0	0	0
376	0	0	0	0	0	0	0
377	0	0	0	0	0	0	0
378	0	52	0	0	0	0	612
379	0	0	0	0	0	0	1,830
380	0	0	0	0	0	0	0
381	0	0	0	1,257	0	0	11
382	0	0	0	8	0	0	0
383	0	0	0	0	0	0	0
384	0	0	0	8	0	0	0
385	0	0	0	0	0	0	1,820
386	0	0	0	0	0	0	0
387	0	0	0	0	0	0	248
388	0	0	0	8	0	0	0
389	0	0	0	5,045	0	0	0
390	0	0	0	0	0	0	0
391	0	0	0	0	0	0	0
392	0	0	0	0	0	0	228
393	0	0	0	0	0	0	0
394	0	0	0	0	0	0	0
395	0	0	0	14	0	0	163
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414	0	0	0	0	0	0	0
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416	0	0	0	8	0	0	0
417	0	0	0	10,273	0	0	0
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420	0	0	0	0	0	0	0
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441	0	0	0	0	0	0	391
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451	0	0	0	0	0	0	0
452	0	0	0	0	0	0	195
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456	0	0	0	0	0	0	35
457	0	0	0	0	0	0	18
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459	0	0	0	8	0	0	42
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502	0	0	0	8	0	0	1,820
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585	0	0	0	0	0	0	92
586	0	52	0	0	0	0	0
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593	0	0	0	0	0	0	0
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595	0	0	0	5.045	0	0	0
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820	0	0	0	0	0	0	0
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837	0	0	0	0	0	0	0
838	0	0	0	0	0	0	0
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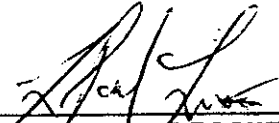
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938	0	0	0	0	0	0	0
939	0	0	0	0	0	0	0
940	0	0	0	0	0	0	0
941	0	0	0	0	0	0	0
942	0	0	0	0	0	0	0
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951	0	0	0	0	0	0	0
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955	0	0	0	0	0	0	0
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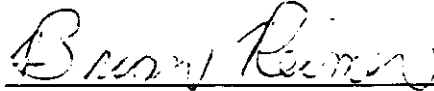|							
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1,222	0	0	0	0	0	79	0

DECLARATION

I, L. Paul Loetscher, declare under penalty of perjury
that the foregoing answers are true and correct to the best
of my knowledge, information, and belief.

_____
L. PAUL LOETSCHER

Dated: October 18, 2001

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.

Brian Reimer

Brian M. Reimer

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
October 18, 2001