

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, 2001

Docket No. R2001-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS LOETSCHER
(POSTCOM/USPS-T-41-1-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for
Postal Commerce submits the attached interrogatories to USPS witness
Loetscher: PostCom/USPS-T-41-1-2.

Respectfully submitted,

Ian Volner FW

Ian D. Volner
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Counsel for Association for Postal Commerce

October 22, 2001

POSTCOM/USPS-T41-1. Please refer to USPS-LR-J-112, stdb_GFY_2000.xls, worksheet GFY RPW. In particular, please refer to the row containing data for Mail Code 4230.

- (a) (a) Please confirm that the original data source from which you derived total STD B CRT BOUND PRINTED MATTER revenues, pieces, and weight was from mailing statements. If not confirmed, please explain fully.
- (b) (b) Please generally describe the process that you used to derive GFY 2000 revenue, piece, and weight estimates for Carrier Route Presort Bound Printed Matter from original source data.
- (c) Please confirm that Witness Kiefer used GFY 2000 piece data to derive TYAR billing determinants. If not confirmed, please explain fully.

POSTCOM/USPS-T41-2. Please refer to USPS-LR-J-112, stdb_q12000.xls, worksheet Shape Final.

- (a) Please confirm that the source data that you used to develop the volume figures on this page were from mailing statements. If not confirmed, please explain fully.
- (b) Please provide a precise definition of a flat as used in this worksheet.
- (c) Please describe the information on mailing statements that you used to determine whether a BPM piece is a flat.
- (d) Please provide a precise definition of a parcel as used in this worksheet.
- (e) Please describe the information on mailing statements that you used to determine whether a BPM piece is a parcel.
- (f) Please confirm that Witness Kiefer used the "shape shares" that you developed to derive TYAR billing determinants. If not confirmed, please explain fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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