

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS L. PAUL LOETSCHER TO INTERROGATORY OF  
ASSOCIATION FOR POSTAL COMMERCE  
(POSTCOM/USPS-T33-2(d), REDIRECTED FROM WITNESS JAMES M. KIEFER)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following interrogatory of the Association for Postal Commerce: POSTCOM/USPS-T33-2(d), filed on October 11, 2001, and redirected from witness James M. Kiefer.

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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October 25, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LOETSCHER  
TO INTEROGATORY OF ASSOCIATION OF POSTAL COMMERCE (POSTCOM)  
REDIRECTED FROM WITNESS KIEFER

**POSTCOM/USPS-T33-2.** Please refer to USPS-LR-J-106, SWP2-1.

. . . .

(d) Please provide the exact definition of a flat that was used to develop the BPM flats volume shares shown in SWP2-1. Please also describe the data source that was used to produce SWP2-1.

**RESPONSE:**

Data for SWP2-1 come from USPS-LR-J-112. The PERMIT system Postage Statement (form 3605) data were used to develop the shape distribution key for presorted BPM.

ODIS data were used to develop the shape distribution key for single piece BPM.

These distribution keys are applied to the Postal Services Revenue, Pieces and Weight estimates by mail code. Flat definitions for ODIS data can be found in USPS-LR-J-75.

PERMIT mailing statement data shape definition come from the Domestic Mail Manual C050, additionally PERMIT system data is edited to restrict flat shaped mail to be less than 4.0 pounds. Thus the precise definition of shape used to develop the distribution key for presorted categories is pieces recorded as flats on form 3605 that have an average weight less than 4.0 pounds.

## **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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