

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KINGSLEY TO INTERROGATORY OF RECORDING INDUSTRY  
ASSOCIATION OF AMERICA  
(RIAA/USPS-T39-1)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatory of Recording Industry Association of America: RIAA/USPS-T39-1, filed on October 15, 2001.

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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Joseph K. Moore

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3078, Fax -5402  
October 29, 2001

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TO INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF AMERICA

**RIAA/USPS-T-39-1** Please refer to page 19 of your testimony where you state, "Prior to implementation of the residual shape surcharge, many, if not all, of these pieces were prepared as machinable parcels."

(a) Please confirm that by "these pieces" your testimony memo pieces with the C050 dictated dimensions of flats that have a thickness between .75 and 1.25 inches.

(b) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses between 3/4" and 1-1/4" were prepared as machinable parcels prior to implementation of the residual shape surcharge.

(c) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses of less than 3/4" were prepared as machinable parcels prior to implementation of the residual shape surcharge.

(d) Please provide all data that you are aware of that quantifies the extent to which Standard Mail "parcels" with thicknesses between 3/4" and 1-1/4" are being prepared as automation flats since implementation of the residual shape surcharge.

(e) Please provide all data that you are aware of that quantifies the extent to which standard Mail "parcels" with thicknesses of less than 3/4" are being prepared as flats since implementation of the residual shape surcharge.

(f) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4". Please identify and describe the data source that was used to develop these figures.

(g) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4" that are being prepared as automation flats. Please identify and describe the data source that was used to develop these figures.

(h) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses of between 3/4" and 1-1/4" that are being prepared as machinable parcels, Please identify and describe the data source that was used to develop these figures.

(i) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail "parcels" with thicknesses less than 3/4". Please identify and describe the data source that was used to develop these figures.

(j) Please provide the FY 2000 piece distribution by ounce increment of Standard

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Mail “parcels” with thicknesses of less than 3/4” that are being prepared as flats. Please identify and describe the data source that was used to develop these figures.

(k) Please provide the FY 2000 piece distribution by ounce increment of Standard Mail “parcels” with thicknesses of less than 3/4” that are being prepared as machinable parcels, Please identify and describe the data source that was used to develop these figures.

**RESPONSE**

(a) Confirmed.

(b) – (c) I am not aware of data responsive to this interrogatory. The reasons are twofold. First, prior to the implementation of the surcharge, the rates charged and, consequently, the volume data collected did not make a distinction between parcels and other non-letters in Standard Mail. Once the surcharge was implemented, volume for pieces prepared as parcels could be isolated. However, the extent to which these mailers shifted to preparing their pieces as barcoded flats cannot be determined since there is no volume data prior to the surcharge with which a meaningful comparison can be made. Secondly, data on parcels are not collected specific to the dimensions of each piece. This statement in my testimony is based on the fact that, prior to the residual shape surcharge and extension of the barcode discount to FSM 1000-sized pieces, there was no incentive for parcel mailers to prepare their pieces according to the significantly more complicated flats preparation requirements as long as their pieces qualified for machinable parcel preparation. Consequently, it is assumed that many, if not all, of the pieces were prepared as machinable parcels.

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(d) – (k) As stated in the response to parts (b) and (c), I am not aware of data by ounce increment specific to the dimensions of each piece.

## 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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Joseph K. Moore

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Washington, D.C. 20260-1137  
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