

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 KIEFER  
(POSTCOM/USPS-T-33-8-12)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for  
Postal Commerce submits the attached interrogatories to USPS witness Kiefer:  
PostCom/USPS-T-33-8-12.

Respectfully submitted,



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October 30, 2001

**POSTCOM/USPS-T33-8.** Please refer to USPS-LR-J-106, BPM-WP-3 and your response to POSTCOM/USPS-T33-4(b).

(a) Please confirm that all of the figures in BPM-WP-3 are GFY 2000 figures.

(b) Please provide an update to BPM-WP-3 using FY 2001, AP 6 – AP 10 data.

(c) Please provide an update to BPM-WP-3 using FY 2001, AP 11 – AP 13 data.

**POSTCOM/USPS-T33-9.** Please describe in detail the major reasons why the Postal Service proposed dropship discounts for Bound Printed Matter in Docket No. R2000-1.

**POSTCOM/USPS-T33-10.** Please refer to your response to POSTCOM/USPS-T33-4(h) where you state, “I also used FY 2001 data for estimating the share of presorted BPM that would be eligible to receive the parcel barcode discount (Input [7b] on workpaper WP-BPM-1)” and the row of WP-BPM-1 with the Note [7b]. Please provide the input data that you used to calculate the percentage figure in the row of USPS-LR-J-106, WP-BPM-1 with the Note [7b], describe each input datum (e.g., the numerator is the volume of barcoded Bound Printed Matter (BPM) parcels for FY 2001, AP 6 – AP 10), and describe how you calculated the percentage figure.

**POSTCOM/USPS-T33-11.** Please refer to USPS-LR-J-106, SWP2-1

(a) Please confirm that the number in the “Flats” column and the row titled “Barcoded Presort BPM” refers to the volume of Bound Printed Matter (BPM) flats that have a parcel barcode on them. If not confirmed, please explain fully.

(b) Please confirm that you calculated the volume in the row titled “Estimated Flats Eligible and Using Flats Barcode” as the volume of Basic (non-Carrier

Route (CR)) Presort flats minus the volume of Barcoded Presort flats. If not confirmed, please explain fully.

(c) Taking into account your response to subpart (b) of this interrogatory, do the Postal Service's Test Year After Rates billing determinants for BPM assume that all "Basic (non-CR) Presorted" flats that did not have parcel barcodes on them in FY 2000 will have flats barcodes on them in the Test Year. If not confirmed, please explain fully. If confirmed, please explain why this is a reasonable assumption.

(d) In FY 2000, what percentage of Basic (non-CR) presorted BPM flats that did not have parcel barcodes on them had flats barcodes on them? Please also provide your data source.

**POSTCOM/USPS-T33-X.** Please refer to your response to POSTCOM/USPS-T33-1(c) where you state, "In the absence of a draft rule, the best current guidance on the eligibility requirements for the flats rate differential is contained in the testimony of witness Linda Kingsley (USPS-T-39). Please refer further to witness Loetscher's response to POSTCOM/USPS-T33-2(d), Section C050 of the Domestic Mail Manual (DMM), and page 19 of USPS-T-39.

(a) Taking into account witness Kingsley's "other concern" described on page 19 of USPS-T-39, do you expect the eligibility requirements for the Bound Printed Matter (BPM) flats rate differential to be more restrictive or less restrictive than the definition of a flat in Section C050 of the DMM. Please explain your response fully.

(b) Please provide all requirements that a flat must meet to be machinable on an FSM 881. Please explain your response fully.

(c) Please compare the definition of a flat that is contained in the DMM to the FSM 881 machinability requirements.

(d) What percentage of total USPS mail volume that meet the DMM definition of a flat meet FSM 881 machinability requirements? Please explain your response fully.

(e) What percentage of BPM pieces that meet the DMM definition of a flat meet FSM 881 machinability requirements? Please explain your response 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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