

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 KINGSLEY TO INTERROGATORY OF ASSOCIATION FOR POSTAL
COMMERCE
(POSTCOM/USPS-T39-12)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T39-12, 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:

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October 31, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE

POSTCOM/USPS-T-39-12 Please refer to page 19 of your testimony where you state, “This supports limiting the proposed BPM flats barcode discount and the flat and parcel rate distinction (witness Kiefer, USPS-T-33) to AFSM 100 compatible criteria.”

(a) Please list all “AFSM 100 compatible criteria”.

(b) In FY 2000, what percentage of Bound Printed Matter pieces met the criteria for AFSM 100 compatibility identified in your response to subpart (a) of this interrogatory? Please also identify and describe the data source that you used to develop this estimate. If you cannot provide a precise estimate, please provide your best guess.

(c) In FY 2000, what percentage of Bound Printed Matter flats met the criteria for AFSM 100 compatibility identified in your response to subpart (a) of this interrogatory? Please also identify and describe the data source that you used to develop this estimate. If you cannot provide a precise estimate, please provide your best guess.

Response:

- a. At the present time, the “AFSM 100 compatible criteria” have not yet been determined. A mail characteristics’ test conducted by an outside consulting firm is expected to be completed soon. The Postal Service is awaiting the final results.
- b. and c. See response to subpart a. Without final definition of the AFSM 100 compatibility criteria, there is no reasonable basis to determine the percentages requested. For the purposes of projecting revenues in the test year, witness Kiefer (USPS-T-33) has assumptions about what percentage of BPM pieces would consist of flats (hence eligible to use BPM flats rates), and what percentages of BPM presort and single-piece flats would be eligible and would use the BPM automatable flats barcode discount. These percentages were developed in his workpaper SWP2-1. The flats volume data are from library reference USPS-LR-J-112. See also responses to POSTCOM/USPS-T-33-1 and POSTCOM/USPS-T-33-2.

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.

Joseph K. Moore

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