

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, 1997

Docket No. R97-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS FRONK
TO INTERROGATORY OF NASHUA, DISTRICT, MYSTIC & SEATTLE
(NDMS/USPS-T32-22)**

The United States Postal Service hereby files the responses of David Fronk to the following interrogatory of Nashua, District, Mystic & Seattle, dated August 8, 1997: NDMS/USPS-T32-22.

The interrogatory is stated verbatim and is followed by the response.

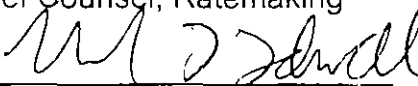
Interrogatories T32-17, T32-18c-e, T32-19 and T32-20 have been redirected to the Postal Service for response. The response to T32-19 was filed on August 18, 1997. The other responses are being filed today. Interrogatories T32-18a-b, T32-21 and T32-22 and T32-23a were redirected to witness Moden for response. Those responses were filed on August 20, 1997. Interrogatory T32-23b was redirected to witness Hatfield for response. That response is being filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

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Washington, D.C. 20260-1137
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August 22, 1997

RESPONSE OF U.S. POSTAL SERVICE WITNESS FRONK TO
INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC. (NDMS)

NDMS/USPS-T32-22.

- a. Is it correct that any mail piece that has a length greater than 11.5" is a "non-letter," by definition? Please explain any negative answer.
- b. Is it correct than any mail piece that has a height greater than 6.125" is a "non-letter," by definition? Please explain any negative answer.
- c. Is it correct that any mail piece that has a thickness greater than 0.25" is a "non-letter," by definition? Please explain any negative answer.
- d. Please define the term "nonstandard letter," and explain how "letters" constitute 58 percent of nonstandard First-Class pieces (LR-H-112, Exhibit A). What characteristics enable these pieces to be classified as "letters" instead of flats or parcels?

RESPONSE:

(a)-(c) Yes. As stated in Section C050.2.0 of the Domestic Mail Manual, letter-size mail may not be more than 11-1/2 inches long, 6-1/8 inches high, or 1/4 inch thick.

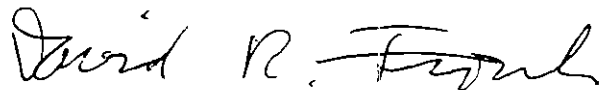
(d) Section C100.4.0 of the Domestic Mail Manual defines Nonstandard First-Class Mail as follows:

Except for Priority Mail, any piece of First-Class Mail weighing 1 ounce or less and not claimed at a card rate is nonstandard and subject to the applicable surcharge if its thickness exceeds 1/4 inch or if, based on the placement (orientation) of the address, its length exceeds 11-1/2 inches, its height exceeds 6-1/8 inches, or its aspect ratio (length divided by height) is less than 1.3 or more than 2.5.

The relationship between length and height, or the aspect ratio, can make letters of nonstandard-size, even if they are within the mail dimensions described in NDMS/USPS-T32-22(a)-(c) above. For example, a letter that is 4 inches long, 4 inches in height, and 1/8 inch in thickness would be nonstandard because its aspect ratio of 1.0 (4 inches / 4 inches) is less than 1.3, not because of its length alone, height alone, or thickness.

DECLARATION

I, David R. Fronk, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

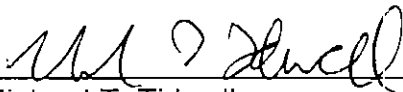


David R. Fronk

8-21-97
Date

CERTIFICATE OF SERVICE

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



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1145
August 22, 1997