

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R97-1

SUPPLEMENTAL RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS CRUM TO INTERROGATORY OF  
NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND  
SEATTLE FILMWORKS, INC.  
(NDMS/USPS-T28-9(f))

The United States Postal Service hereby provides a supplement to the response of witness Crum to interrogatory NDMS/USPS-T28-9(f), originally filed on August 22, 1997. A replacement page incorporated the supplement is attached.

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



Scott L. Reiter

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August 27, 1997

**U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM  
RESPONSE TO INTERROGATORIES OF NDMS**

Response to NDMS/USPS-T28-9 continued

Revised  
8/27/97

f. Assuming you are referring to the analysis presented in LR-H-108 and not the survey referred to in LR-H-108 and supplied as LR-PCR-50, they would be classified as flats and parcels based on the Processing Category checked on the Postage (mailing) statement. Also, according to the DMM, flats and parcels have different preparation requirements, making your hypothetical situation appear unlikely.

The situation you describe may indeed occur, but it is my understanding that the volume proportion is usually either heavily weighted towards pieces over 3/4" in thickness or pieces under 3/4" in thickness. The clerk confirms the processing category based on the majority of the volume in the mailing.

DECLARATION

I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Charles L. Crum

Dated: 27 AUGUST 1997

**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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Scott L. Reiter

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August 27, 1997