

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

RECEIVED
AUG 29 5 30 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DEGEN TO INTERROGATORIES OF
THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T12-1-2)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of the Newspaper Association of America: NAA/USPS-T12-1-2, filed on August 15, 1997.

Each 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



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5402
August 29, 1997

**Response of United States Postal Service Witness Degen
to Interrogatories of the Newspaper Association of America**

NAA/USPS-T12-1. Please refer to the discussion at page 7, lines 17-18 and page 8, 1-6 of your direct testimony, regarding the assignment of the tallies at MODS offices to cost pools. Please provide the following data:

- a. The percentage of tallies that contain a valid MODS operation code.
- b. The percentage of tallies assigned to cost pools based on combinations of IOCS question 18 and 19 responses; and
- c. The percentage of tallies assigned to cost pools using the IOCS operation codes.

NAA/USPS-T12-1 Response.

- a. There are 193,138 tallies taken at MODS offices in the FY 1996 IOCS file (including divided item records). Of these, 190,595 or 98.7% had valid MODS operation codes.
- b. Remap criteria based on detailed question 18/19 responses assign the cost pool for 804 tallies, or 0.4% of total MODS tallies.
- c. Remap criteria based on the recorded IOCS operation code (variable F260) assigned the cost pool for 1,496 tallies, or 0.8% of the total MODS tallies. Note that the IOCS operation code is actually based on the question 18 response. The remaining tallies were assigned residually to 1MISC or LD43.

**Response of United States Postal Service Witness Degen
to Interrogatories of the Newspaper Association of America**

NAA/USPS-T12-2. Please refer to Table 5 of your written testimony. For each of the MODS codes listed in Table 5, please provide the following data:

- a. The number of direct tallies;
- b. The number of mixed mail tallies (broken down into: "counted" mixed mail item, "uncounted" mixed mail item, "identified" mixed mail container and "not-identified" mixed mail container categories, if possible); and
- c. The number of not-handling-mail tallies.

NAA/USPS-T12-2 Response.

- a.-c. Attachment 1 to this response provides the requested data. Please note that the term "direct tally" is defined to include records for counted mixed-mail items, therefore such records are included in the direct column of the attachment.

FY96 IOCS Unweighted Tally Counts by Cost Pool and Handling Category

Cost Pool	Direct [1]	Mixed Items	Identified Mixed Containers	Not-identified Mixed Containers	Not-Handling	Total
manl	13,350	327	252	271	6,469	20,669
manf	4,621	137	242	224	2,671	7,895
manp	432	27	70	80	553	1,162
mecparc	88	27	13	16	85	229
spbs Oth	1,148	125	153	177	1,250	2,853
spbsPrio	478	38	84	52	627	1,279
lsm/	6,666	212	95	98	2,507	9,578
fsm/	6,026	301	228	275	3,223	10,053
ocr/	2,048	135	104	105	1,257	3,649
bcs/	5,968	447	366	330	3,854	10,965
LD41	166	9	12	5	238	430
LD42	71	3	5	1	64	144
priority	1,515	185	181	148	1,557	3,586
express	611	94	50	26	1,223	2,004
Registry	961	161	93	72	1,566	2,853
LD15	103	3	9	10	77	202
BusReply	242	5	11	8	210	476
REWRAP	76	7	7	3	150	243
MAILGRAM	2	0	0	0	6	8
LD48 Exp	17	3	1	0	55	76
LD48_Adm	346	11	18	23	2,312	2,710
LD48_SSv	549	9	15	19	1,112	1,704
LD48 Oth	550	29	54	50	1,423	2,106
LD49	2,380	56	40	57	1,878	4,411
LD79	342	28	23	28	1,977	2,398
LD44	1,369	29	19	24	899	2,340
LD43	4,536	198	376	371	4,587	10,068
1Platfrm	1,575	557	2,306	1,396	9,692	15,526
1OPpref	3,618	513	912	841	5,365	11,249

FY96 IOCS Unweighted Tally Counts by Cost Pool and Handling Category

Cost Pool	Direct [1]	Mixed Items	Identified Mixed Containers	Not-identified Mixed Containers	Not-Handling	Total
1OPbulk	1,409	188	305	331	2,067	4,300
1POUCHNG	2,093	437	713	486	3,564	7,293
1SackS_h	571	137	349	205	1,616	2,878
1SackS_m	164	77	49	59	476	825
1Bulk pr	72	19	16	14	131	252
1CancMPP	2,376	96	295	239	2,004	5,010
1SCAN	305	261	151	93	1,017	1,827
1EEQMT	15	125	28	85	424	677
1SUPPORT	145	8	21	18	2,789	2,981
1MISC	215	28	66	60	1,461	1,830
INTL	3,587	388	337	181	3,804	8,297
BMC SSM	314	55	13	5	152	539
BMC Other	1,579	311	442	489	1,289	4,110
BMC PSM	1,130	9	21	9	249	1,418
BMC SPB	640	135	50	68	283	1,176
BMC NMO	214	15	32	55	151	467
BMC Platform	696	179	356	299	1,472	3,002
BMC Z Breaks	0	0	0	0	2,555	2,555
Non-MODS [2]	12,267	430	679	722	6,460	20,558
Total	87,652	6,574	9,662	8,128	88,854	200,870

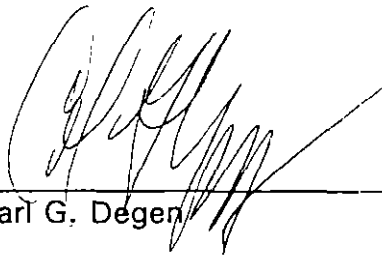
Notes:

[1] Includes top piece rule items; items and containers with identical mail; counted mixed-mail items

[2] Includes break/personal needs (activity code 6521) tallies

DECLARATION

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Carl G. Degen

Date: 8-29-97

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.


Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
August 29, 1997