

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 NIETO TO INTERROGATORY OF  
THE AMERICAN BUSINESS PRESS  
REDIRECTED FROM WITNESS TAUFIQUE  
(ABP/USPS-T34-10(D))

The United States Postal Service hereby provides the response of witness Nieto to the following interrogatory subpart submitted by the American Business Press: ABP/USPS-T34-10(d), filed on August 20, 1997, and redirected from witness Taufique.


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

Respectfully submitted,

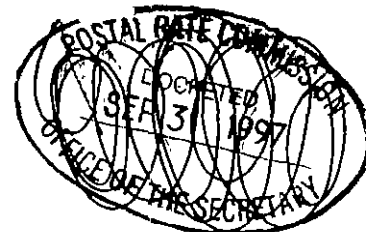
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
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September 3, 1997



ANSWER OF NORMA B. NIETO TO INTERROGATORY OF  
AMERICAN BUSINESS PRESS  
(REDIRECTED FROM WITNESS TAUFIQUE)

ABP/USPS-T34-10(d). On p. 14, line 23, you refer to "average haul" as a factor in allocation of distance related transportation costs to periodical rate zones.

(d) Confirm that data comparable to that described in part c above also available [sic] for rail contracts.

RESPONSE:

ABP/USPS-T34-10(d).

(d) Not confirmed. The Postal Service purchases intra-BMC freight rail transportation on a day-to-day, as-needed basis. The Postal Service negotiates contracts with freight railroads, designating rates and routing information. When the Postal Service uses freight rail transportation, payments are made at the rates specified in the contracts. This fundamental difference in contract structure makes drawing similarities with HCSS inappropriate. Neither of the databases that concern rail contracts (the National Air and Surface System (NASS) and the Rail Management Information System (RMIS)) contain the types of data referred to in part (c) of your question.

## DECLARATION

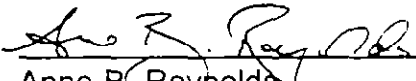
I, Norma B. Nieto, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Norma B. Nieto

Dated: 9-3-97

## 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.

  
Anne B. Reynolds

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