

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PICKETT TO INTERROGATORY OF
MAJOR MAILERS ASSOCIATION
(MMA/USPS-T17-1)

The United States Postal Service hereby provides the response of witness Pickett to the following interrogatory of Major Mailer's Association: MMA/USPS-T17-1, filed on October 26, 2001. It should be noted that MMA misnumbered the interrogatory, designating it as MMA/USPS-T~~18~~-1, whereas the correct designation is MMA/USPS-T17-1. The Postal Service has used the correct designation in this response.

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:



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November 9, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS JOHN T. PICKETT TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION

MMA/USPS-T17-1 As part of their worksharing efforts, mailers who mail sufficient First-Class volumes are required to presort postal trucks with pallets that are destined to the same destination office. Often, such trucks bypass the originating postal facility and are sent directly to a HASP or an airport.

- A. Are you familiar with this aspect of worksharing? Please explain.
- B. Please explain in detail how such a practice by workshare mailers saves money for the Postal Service.
- C. Please provide all studies and other documents that discuss and/or quantify the savings to the USPS of this worksharing practice.

RESPONSE

- A. No.
- B. I have not studied this issue and it has nothing to do with my testimony. I am not certain what is meant by "presort postal trucks with pallets." Therefore, I cannot explain in detail how this worksharing practice might or might not save money for the Postal Service.
- C. I know of no such studies.

DECLARATION

I, John T. Pickett, declare under penalty of perjury the foregoing answers are true and correct, to the best of my knowledge, information and belief.

John T. Pickett
Date: 11/9/01

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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