

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY
(NAA/USPS-T39-1-5)

The United States Postal Service hereby provides the response to the following interrogatories of Newspaper Association of America: NAA/USPS-T39-1-5, filed on October 26, 2001, and redirected from witness Kingsley.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 9, 2001

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NAA/USPS-T39-1 Please refer to Page 28, lines 7 to 9, of your testimony.
Please provide the Postal Service's best information regarding:

- a. The total number of routes;
- b. The number of routes that use vertical flats cases (which you characterize as "most" routes); and
- c. The number of rates that (sic) uses (sic) horizontal flats cases.

Response:

- a. The number of city routes at the end of FY 2000 totaled 168,119.
The number of rural routes at the end of FY 2001 totaled 69,066.
- b. Routes using the vertical flat cases are determined locally and are not tracked exactly on a national basis.
- c. Routes using the horizontal flat cases are determined locally and are not tracked exactly on a national basis.

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NAA/USPS-T39-2 Please describe the physical characteristics of, and how sorting of Standard A Enhanced Carrier Route mail is performed using:

- a. Vertical flats cases
- b. Horizontal flats cases

Response:

Standard Enhanced Carrier Route mail can be either letters or flats and come in delivery sequence.

- a. In a vertical flat case scenario, all letters and flats are cased together. This includes Standard Enhanced Carrier Route mail.
- b. In a horizontal flat case scenario, letters and flats are cased separately. This is true even with Standard Enhanced Carrier Route mail.

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NAA/USPS-T39-3 Please describe the letter casing arrangements for First Class and Standard A mail in offices with:

- a. Vertical flats cases
- b. Horizontal flats cases

Response:

- a. In vertical flat case offices the letters are cased with the flats.
- b. In horizontal flat case offices, the letters are cased separately.

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NAA/USPS-T39-4 Has the Postal Service conducted any study of the cost savings associated with walk-sequencing since the Shipe study that was in evidence in Docket No. R90-1? If so, please provide copies of all such studies.

Response:

No.

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NAA/USPS-T39-5 Please provide the best information available regarding the average or typical number of delivery points for each of the following types of routes, and indicate the source of the number:

- a. Single Delivery Residential
- b. Multiple Delivery Residential
- c. Business and Mixed

Response: Postal Service HQ does not track the “average or typical” number of delivery points by type of route.

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.

Joseph K. Moore

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