

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 INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE
REDIRECTED FROM WITNESS KIEFER
(POSTCOM/USPS-T33-12(d))

The United States Postal Service hereby files its response to the following interrogatory of the Association for Postal Commerce: POSTCOM/USPS-T33-12(d), filed on October 30, 2001, and redirected from witness Kiefer.

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 13, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTEROGATORIES OF ASSOCIATION OF POSTAL COMMERCE
REDIRECTED FROM WITNESS KIEFER**

POSTCOM/USPS-T33-12. Please refer to your response to POSTCOM/USPS-T33-1(c) where you state, "In the absence of a draft rule, the best current guidance on the eligibility requirements for the flats rate differential is contained in the testimony of witness Linda Kingsley (USPS-T-39). Please refer further to witness Loetscher's response to POSTCOM/USPS-T33-2(d), Section C050 of the Domestic Mail Manual (DMM), and page 19 of USPS-T-39.

(d) What percentage of total USPS mail volume that meet the DMM definition of a flat meet FSM 881 machinability requirements? Please explain your response fully.

RESPONSE:

The Postal Service does not collect any data that distinguish between flats that meet the definition contained in the Domestic Mail Manual (DMM) section C050.3.1 and those that meet the requirements for processing on the FSM 881 described in DMM section C820.

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.

Scott L. Reiter

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