

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

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS LOETSCHER
(POSTCOM/USPS-T-41-3-4)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for
Postal Commerce submits the attached interrogatories to USPS witness
Loetscher: PostCom/USPS-T-41-3-4.

Respectfully submitted,

Ian D. Volner

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Counsel for Association for Postal Commerce

November 16, 2001

POSTCOM/USPS-T41-3. Please refer to USPS-LR-J-165, page 55, which provides pieces per pound and pieces per foot for various types of mail.

(a) Please confirm that the average pounds per inch for originating standard flat mail is 1.98 (pieces per foot divided by pieces per pound divided by 12). If not confirmed, what is the correct figure?

(b) Please confirm that your response to (a) implies that the average height of an originating standard flat weighing 1.98 pounds is one inch. If not confirmed, what is the average height of an originating standard flat weighing 1.98 pounds?

(c) Please define "originating standard" flat.

POSTCOM/USPS-T41-4. Please refer to your response to POSTCOM/USPS-T41-2(b) where you state, "PERMIT mailing statement data shape definition comes from the Domestic Mail Manual C050. Additionally, PERMIT system data is edited to restrict flat shaped mail to be less than 4.0 pounds. Thus the precise definition of shape used in this table is pieces recorded as flats on form 3605 that have an average weight less than 4.0 pounds."

(a) Please explain in detail why the "PERMIT system data is edited to restrict flat shaped mail to be less than 4.0 pounds."

(b) Please provide a percentage distribution of Presort Bound Printed Matter flat mail pieces by ½-pound weight increment.

(c) Please provide all rate implications that would have resulted from recording a Bound Printed Matter piece as a flat instead of as a parcel in FY 2000.

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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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