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
WITNESS L. PAUL LOETSCHER TO INTERROGATORY OF
ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T33-13(a), REDIRECTED FROM WITNESS JAMES M. KIEFER)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following interrogatory of the Association For Postal Commerce: POSTCOM/USPS-T33-13(a), filed on November 9, 2001, and redirected from witness James M. 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

Brian M. Reimer Attorney

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3037 Fax –5402 November 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL LOETSCHER TO INTEROGATORY OF ASSOCIATION FOR POSTAL COMMERCE

POSTCCOM/USPS-T33-13:

The following questions refer to your Supplemental Workpaper 2:

- (a) Does LR-J-112 differentiate between flats and parcels/IPPs?
 - 1. If so, on what is that differentiation based?
 - 2. If not, how did you make the differentiation in your Work paper?

. . . .

RESPONSE:

Yes. LR-J-112 differentiates between flats and parcels/IPP's. See my response to POSTCOM/USPS-T41-2.

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.

Brian M. Reimer

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 21, 2001