

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 KINGSLEY TO INTERROGATORY OF RECORDING INDUSTRY
ASSOCIATION OF AMERICA REDIRECTED FROM WITNESS SCHENK
(RIAA/USPS-T43-5(b)-(d) and (f))

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of Recording Industry Association of America redirected from witness Schenk: RIAA/USPS-T43-5(b)-(d) and (f), filed on November 9, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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November 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORY OF RECORDING INDUSTRY ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS SCHENK

RIAA/USPS-T-43-5 Please refer to your response to PostCom/USPS-T43-20, in which you refer to instructions for Question 22 in USPS-LR-I-14/R2000-1 for “provid[ing] documentation on how the In-Office Cost System (IOCS) defines a flat, an automation flat, a parcel, and an IPP.” Please further refer to your response to PostCom/USPS-T43-2p, in which you refer to sections C050 and C820 of the Domestic Mail Manual for “provid[ing] documentation on how the Domestic Mail Manual defines a flat, an automation flat, a parcel, and an IPP.”

(b) Please confirm that section CO50.3.2 of the current Domestic Mail Manual refers to section C820 for “dimensional criteria” for “automation-compatible flat-size mail.” If not confirmed, please explain fully.

(c) Please confirm that section C820.1.0 of the current Domestic Mail Manual states that pieces may qualify as automation-compatible flat-size mail under either the FSM 881 or FSM 1000 requirements. If not confirmed, please explain fully.

(d) Please confirm that an item with a length between 4 and 13 inches, a height between 4 and 12 inches, and a thickness greater than 0.75 inch but less than 1.25 inches satisfies the size definitions of an automation-compatible flat-size mail piece according to the FSM 1000 requirements in section C820.3.3 of the current Domestic Mail Manual. If not confirmed, please explain fully.

(f) Please confirm that the current definition of the size requirements for FSM 1000 automation-compatible flat-size mail became effective on October 4, 1998.

Response:

(b) Confirmed. However, the definition of a flat in DMM C050.3.1 is more limited in scope and is more consistent with how the piece is handled in mail processing and delivery operations. There are pieces that meet the FSM 1000 automation compatible definitions on C820.3 yet are handled as parcels in mail processing and delivery operations. See page 19, lines 1-31 of my testimony, USPS-T-39.

(c) Confirmed.

(d) Confirmed.

(f) Confirmed.

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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