

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

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF ASSOCIATION OF POSTAL COMMERCE REDIRECTED  
FROM WITNESS LOETSCHER  
(POSTCOM/USPS-T41-3)

The United States Postal Service hereby provides the response to the following interrogatory of Association of Postal Commerce redirected from witness Loetscher: POSTCOM/USPS-T41-3, filed on November 16, 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.  
Chief Counsel, Ratemaking

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Joseph K. Moore

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November 30, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF ASSOCIATION OF POSTAL COMMERCE REDIRECTED  
FROM WITNESS LOETSCHER

**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,

**Response:**

- (a) Confirmed.
- (b) Not confirmed. The fact that there are an average of 1.98 pounds of originating standard flats per inch in a flats tray or stacker does not have any apparent relation to the average height of a 1.98 pound flat. Even if we assume that you meant thickness rather than height, Standard Mail flats are limited to 1 pound. Even if there were 1.98 pound Standard flats, the cumulative average thickness of 1.98 pounds of mixed Standard flats would not say anything about the average thickness of flats that each weigh 1.98 pounds.
- (c) An “originating standard” flat is a flat entered at Standard Mail rates and located at the origin processing plant.

## 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.

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Joseph K. Moore

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