

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 ROBINSON  
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T39-4(C), REDIRECTED FROM WITNESS KINGSLEY)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-T39-4(C), filed on November 16, 2001.

The interrogatory has been redirected from witness Kingsley to witness Robinson for response.

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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Michael T. Tidwell

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November 30, 2001

## 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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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
November 30, 2001

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THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS KINGSLEY

**OCA/USPS-T39-4.** Please refer to the response to OCA/USPS-167.

- c. Refer to the response to part o., where it states that “The Test Year Before Rates volume includes only the nonstandard pieces and the Test Year After Rates [volume] includes both the nonstandard and non-machinable [pieces].” For the Test Year After Rates, please provide volume of pieces that are nonstandard and the volume of pieces that are nonmachinable. Show all calculations.

**RESPONSE:**

- c. To clarify, letter-sized nonstandard pieces are nonmachinable. The response to POIR 4, Question 6 disaggregates the test-year-after-rates volume that would pay the proposed nonmachinable surcharge for the single-piece First-Class Mail, and Nonautomation Presort rate categories into (1) pieces that would pay the proposed nonmachinable surcharge because they meet the current nonstandard definition, and (2) pieces that would pay the proposed nonmachinable surcharge because they fall under the expanded definition of “nonmachinability” proposed in this docket. By definition, First-Class Mail Automation Letters and First-Class Mail Carrier Route Letters are machinable and, therefore, not subject to the proposed nonmachinable surcharge. For Automation Flats, the proposed nonmachinability definition is the same as the current nonstandard definition. Therefore, in the test-year-after-rates, all Automation Flats projected to pay the proposed nonmachinable surcharge – 143,545 (000) pieces – do so because they fall under the current nonstandard definition.

