

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

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS L. PAUL LOETSCHER TO INTERROGATORY OF  
ASSOCIATION FOR POSTAL COMMERCE  
(POSTCOM/USPS-T41-4)

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-T41-4, filed on November 16, 2001. Another interrogatory filed in the same set -- POSTCOM/USPS-T41-3 -- has been redirected to witness Linda A. Kingsley.

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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Attorney

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November 30, 2001

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

**POSTCCOM/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  $\frac{1}{2}$ -pound 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.

**RESPONSE:**

- (a) When I processed the PERMIT data I checked each record for possible data entry errors. In this process I discovered a few records that had the processing category recorded as flats, but had large average piece weights. I suspected that these records were recorded in error, and reasonable data edits were in order. The 4.0-pound limit was arrived at by taking the maximum dimensions for a flat in DMM C050 (12" x 15" x 0.75") multiplied by the density of a standard ream of business paper (0.0267 pounds per cubic inch). Thus I calculated the maximum weight of a flat shaped piece to be 3.61 pounds. The 4.0-pound number was chosen to allow for higher density paper.
- (b) See Table 1.
- (c) Redirected to Witness Kiefer.

POSTCOM/USPS-T41-4(b)

Table 1

Percentage Distribution of  
Presorted Bound Printed Matter  
By Half Pound Weight Increment

<u>Weight inc</u>	<u>Percent</u>
LT 0.5	0.03%
0.5 - 1.0	0.57%
1.0 - 1.5	49.69%
1.5 - 2.0	23.50%
2.0 - 2.5	7.89%
2.5 - 3.0	8.35%
3.0 - 3.5	3.55%
3.5 - 4.0	2.26%
4.0 - 4.5	0.76%
4.5 - 5.0	0.85%
5.0 - 5.5	0.65%
5.5 - 6.0	0.59%
6.0 - 6.5	0.25%
6.5 - 7.0	0.22%
7.0 - 7.5	0.14%
7.5 - 8.0	0.09%
8.0 - 8.5	0.09%
8.5 - 9.0	0.09%
9.0 - 9.5	0.03%
9.5 - 10.0	0.01%
10.0 - 10.5	0.06%
10.5 - 11.0	0.05%
11.0 - 11.5	0.05%
11.5 - 12.0	0.03%
12.0 - 12.5	0.02%
12.5 - 13.0	0.06%
13.0 - 13.5	0.01%
13.5 - 14.0	0.12%
14.0 - 14.5	0.01%
GT 14.5	0.00%

**DECLARATION**

I, L. Paul Loetscher, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

  
L. PAUL LOETSCHER

Dated: 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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Brian M. Reimer

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