

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 SCHENK TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS KINGSLEY
(OCA/USPS-T39-5-7)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T39-5-7, filed on November 16, 2001. Interrogatories OCA/USPS-T39-5-7 were redirected from witness Kingsley.

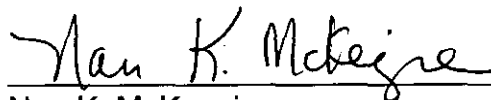
The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

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November 30, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS KINGSLEY**

OCA/USPS-T39-5. Please refer to LR58ASP.xls, sheet "volume&lbs."

- a. Please confirm that 74.99 percent of single-piece First-Class letter-shaped pieces weight 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 19.93 percent of single-piece First-Class letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed. Note that the letters volumes in the named spreadsheet do not include card volumes.
- b. Confirmed. Note that the letters volumes in the named spreadsheet do not include card volumes.

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REDIRECTED FROM WITNESS KINGSLEY**

OCA/USPS-T39-6. Please refer to LR58PRE.xls, sheet "volume&lbs."

- a. Please confirm that 38.01 percent of presorted First-Class letter-shaped pieces weigh 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 59.30 percent of presorted First-Class letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed. Note that the letters volumes in the named spreadsheet do not include card volumes.
- b. Confirmed. Note that the letters volumes in the named spreadsheet do not include card volumes.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS KINGSLEY**

OCA/USPS-T39-7. Please refer to LR58AREG.xls, sheet "volume&lbs."

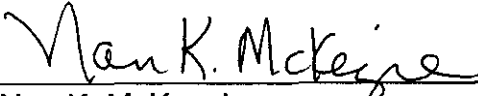
- a. Please confirm that 35.00 percent of Standard Regular letter-shaped pieces weigh 0.5 ounces or less. If you do not confirm, please explain.
- b. Please confirm that 48.48 percent of Standard Regular letter-shaped pieces weigh more than 0.5 ounce and less than or equal to 1.0 ounce. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed. Note that the letters volumes in the named spreadsheet do not include card volumes.
- b. Not confirmed. The percent of Standard Regular letter-shaped pieces that weigh more than 0.5 ounces and less than or equal to 1.0 ounce is 43.48 percent (18,288,904,399/42,061,307,618). Note that the letters volumes in the named spreadsheet do not include card volumes.

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.



Nan K. McKenzie

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