

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 POSTAL SERVICE WITNESS KAY  
TO MPA INTERROGATORY MPA/USPS -T21-1  
(December 4, 2001)

The United States Postal Service hereby provides its response to the following interrogatories of MPA: MPA/USPS-T21-1, filed on November 20, 2001. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

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December 4, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KAY TO  
INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA

MPA/USPS-T21-1. Please refer to Section IV of your testimony regarding rural carrier costs.

- (a) What percentage of Periodicals Outside-County mail volume is delivered by rural carriers?
- (b) Please confirm that the rural carrier costing method used by the Postal Service in this case is exactly the same as that used by the Commission in Docket No. R2000-1. If not confirmed, please explain all differences.
- (c) Please provide the unit rural carrier cost for casing and delivering a Carrier Route flat that is not in Line Of Travel (LOT) sequence and the unit rural carrier cost for casing and delivering a Carrier Route flat that is in LOT sequence. Please explain why these unit cost figures are the same or why they are different.

RESPONSE


- a. This information is not available.
- b. Confirmed. However, the DPS and Sector Segment distribution keys were not available from the Rural Carrier Cost System in the Docket No. R2000-1 base year. A combined DPS/Sector Segment distribution key was derived from the letter distribution key by moving into the DPS key the estimated percentage of letters that were determined to be DPS mail. The DPS and Sector Segment distribution keys were available for PQ3 and PQ4 in the subsequent filing of the FY 1999 CRA during Docket No. R2000-1, and were used in rural carrier costing. For this case, the Rural Carrier Cost System provides distribution keys for DPS and Sector Segment mail for all postal quarters, and these are used in rural carrier costing.
- c. Rural carrier compensation is determined by a physical count of mail items received by the carrier during the National Rural Mail Count time period.

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Rural carriers are compensated at a rate of 0.125 minutes per piece for delivering a flat, plus an additional time credit of 0.0166 minutes for pulldown or strapout. It is my understanding that the same compensation applies to any flat delivered by rural carriers, regardless of mail subclass or presort level.

**DECLARATION**

I, Nancy R. Kay, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Nancy R. Kay", is written over a solid horizontal line.

Dated: 12-3-01

**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.



Eric P. Koetting

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