

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
MAGAZINE PUBLISHERS OF AMERICA, INC.
(MPA/USPS-T41-7)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following interrogatory of the Magazine Publishers of America, Inc.:
MPA/USPS-T41-7, filed on November 20, 2001.

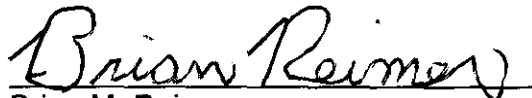
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Brian M. Reimer
Attorney

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December 4, 2001

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RESPONSE:

The data collected to produce USPS-LR-J-114 provides entry point and container destination ZIP code for sampled containers. However, postal zone is calculated based on the entry point of the piece and the destination of the piece, not the container. The destination information collected for USPS-LR-J-114 applies only to the container. Thus, the information requested by this interrogatory cannot be obtained from the USPS-LR-J-114 data. I am unaware of any data collected by the Postal Service that could be used to produce the information requested.

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: December 4, 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.


Brian M. Reimer

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