

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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS KIEFER
(POSTCOM/USPS-T-33-19-20)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Kiefer: PostCom/USPS-T-33-19-20.

Respectfully submitted,



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December 6, 2001

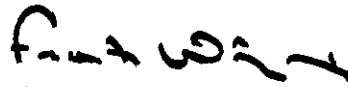
POSTCOM/USPS-T33-19. Please refer to page 32 of your testimony where you state, "Lacking any direct costs for BPM, I have used the difference in costs between Standard Mail 3/5 presort automation and nonautomation flats estimated by witness Miller (USPS-T-24) to proxy the BPM flats barcode cost savings."

- (a) What is the required presort level (e.g., basic, 3-digit, 5-digit) for flats that are entered at origin facilities?
- (b) What is the required presort level for flats that are entered at destination bulk mail centers (DBMC)?
- (c) What is the average size of a mailing of non-Carrier Route BPM flats?
- (d) What is the average size of a mailing of Standard Regular flats?
- (e) What is the average size of a mailing of Standard Regular basic presort flats?
- (f) What is the average size of a mailing of Standard Regular 3/5 presort flats?
- (g) Based upon your responses to subparts (a)-(f) of this interrogatory, please explain in detail why you chose the difference in costs between Standard Mail 3/5 presort automation and nonautomation flats as a proxy for BPM flats barcode cost savings as opposed to the Standard Mail Basic presort automation cost difference or a weighted average of the Standard Mail Basic and 3/5 presort automation cost differences.

POSTCOM/USPS-T33-20. Please provide all information that that you have regarding the proportion of GFY 2000 non-Carrier Route Presort Bound Printed Matter flats that had Postnet barcodes on them.

CERTIFICATE OF SERVICE

I hereby certify that I have this date 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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