

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
TO JOINT INTERROGATORY OF THE AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
(ABA&NAPM/USPS-T43-3(f)-(h))

The United States Postal Service hereby provides the response to the following
interrogatory of the American Bankers Association and National Association of Presort
Mailers: ABA&NAPM/USPS-T43-3(f)-(h), filed on November 21, 2001.

ABA&NAPM/USPS-T43-3(f)-(h) was redirected from witness Schenk.

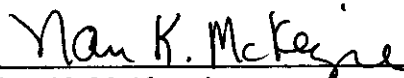
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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December 6, 2001

ABA&NAPM/USPS-T43-3 You assert in your testimony at line 9, page ii, that you have had experience with "cost models of mail processing".

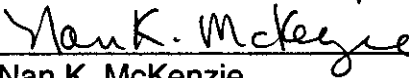
- f. Is there any part of cost segment 3.1 in the final preparation of mail for delivery that was formerly activity conducted by carriers?
- g. Do carriers spend more time on mail processing docks under automation than they used to before automation?
- h. If your answer to g. is in the affirmative, please explain fully why carriers have to spend more time on the docks and less time on the streets actually delivering mail.

RESPONSE:

- f. Cost Segment 3.1 includes costs for automated DPS of letter mail, which activity is (or was) performed manually by carriers in the non-DPS environment.
- g. No. Generally, there is no reason for carriers to be on a dock at a processing plant.
- h. Not applicable.

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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