

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 INTERROGATORY
OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-3)

The United States Postal Service hereby provides its response to the following interrogatory of Major Mailers Association: MMA/USPS-3, filed on November 16, 2001.

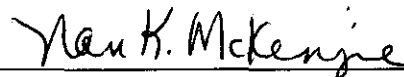
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

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December 11, 2001

MMA/USPS-3.

Please refer to USPS witness Schenk's response to Part C of Interrogatory MMA/USPS-T43-7. There she claims that FY93 volumes comparable to the BY00 volumes she provided in worksheet "Delivery Volumes" of Library Reference USPS -LR-J-117 are not available to her knowledge. If available, please provide the FY93 First-Class letter-shaped volumes separately for single piece and presorted that were delivered by (1) rural carriers, (2) city carriers, and (3) to post office boxes. If such volumes are not available for FY93, please provide the best estimates that are available for FY93 and provide actual volumes for the closest FY period prior to and after FY93 for which actual data are available.

Response:

The data included in this response were not readily available. Obtaining the data involved contacting a witness in R-94 and obtaining the output containing the requested data. After an exhaustive search, the R94-1 witness found copies of relevant printouts in his personal files. Data are normally only archived for five years.

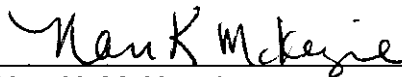
| | |
|---|----------------|
| City Carrier First Class Mail Single Piece Letters | 23,815,756,197 |
| City Carrier First Class Mail Presorted Letters | 22,324,832,895 |
| Rural Carrier First Class Mail Single Piece Letters | 3,204,542,000 |
| Rural Carrier First Class Mail Presort Letters | 3,113,859,000 |

Please note that the rural letters refer to the measurement definitions utilized for the rural carrier cost system, not the DMM definition for letters. There is no crosswalk available to convert the FY 1993 rural letter volumes to DMM letter volumes.

There are no estimates available for the volumes of mail delivered to PO Boxes for FY 1993.

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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