

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL
LOETSCHER TO FOLLOW-UP INTERROGATORY OF ASSOCIATION FOR POSTAL
COMMERCE (POSTCOM/USPS-T41-5)
(December 19, 2001)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following follow-up interrogatory of the Association for Postal Commerce: POSTCOM/USPS-T41-5, filed on December 5, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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December 19, 2001

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POSTCOM/USPS-T41-5.

Please refer to your response to POSTCOM/USPS-T41-4 where you discuss your method for determining the maximum weight of a flat-shaped Bound Printed Matter (BPM) piece.

- (a) **POSTCOM/USPS-T41-4(b)** asked for a “percentage distribution of Present Distribution flat mail pieces...” (emphasis supplied). Your caption to Table 1 does not indicate that it is limited to flat shaped BPM pieces. Is it? If your answer is anything but an unequivocal affirmative:
- (1) Provide the information requested for BPM flats.
 - (2) Describe, by shape, the population of mail pieces on which Table 1 reports.
- (b) What is the average height and width of a BPM flat? Please also describe your data source.
- (c) What is the average height and width of a flat delivered by the Postal Service regardless of mail subclass? Please also describe your data source.
- (d) Using the density of a standard ream of business paper that you specified in your response to POSTCOM/USPS-T41-4 (0.0267 pounds per cubic inch), what is the weight of a BPM flat with a thickness of $\frac{3}{4}$ ” and with the average BPM flat height and width specified in your response to subpart (a) of this interrogatory?
- (e) What percentage of BPM flats weigh more than the weight calculated in your response to subpart (c) of this interrogatory? Please describe your data source and provide all underlying calculations.
- (f) Using the density of a standard ream of business paper that you specified in your response to POSTCOM/USPS-T41-4 (0.0267 pounds per cubic inch), what is the weight of a BPM flat with a thickness of $\frac{3}{4}$ ” and with the average height and width specified in your response to subpart (b) of this interrogatory?
- (g) What percentage of BPM flats weigh more than the weight calculated in your response to subpart (e) of this interrogatory? Please describe your data source and provide all underlying calculations.
- (h) Please provide a percentage distribution of BPM flats by one-inch height increment and describe your data source.
- (i) Please provide a percentage distribution of flats regardless of mail subclass by one-inch height increment and describe your data source.

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- (j) Please provide a percentage distribution of BPM flats by one-inch width increment and describe your data source.
- (k) Please provide a percentage distribution of flats regardless of mail subclass by one-inch width increment and describe your data source.
- (l) Please provide a percentage distribution of Presort Bound Printed Matter parcels mail pieces by ½-pound increment that is analogous to Table 1 in your response to PostCom/USPS-T41-4b for Presort Bound Printed Matter flat-shaped mail pieces.

Response:

(a) Table 1 supplied in response to Postcom/USPS-T41-4 is the percentage distribution of flat shaped Presort BPM as requested.

(b)–(k) I am unaware of any Postal Service data source that would permit me to answer these interrogatories.

(l) See attached Table 1.

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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