

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 INTERROGATORY OF AMERICAN BUSINESS MEDIA AND THE
McGRAW-HILL COMPANIES, REDIRECTED FROM WITNESS ALTAF H. TAUFIQUE
(ABM-MH/USPS-T34-43)
(December 19, 2001)

The United States Postal Service hereby files the response of witness L. Paul Loetscher to the following interrogatory of American Business Media and the McGraw-Hill Companies, redirected from witness Altaf H. Taufique: ABM-MH/USPS-T34-43, 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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ABM-MH/USPS-T34-43.

In Mr. Taufique's response to CRPA-NFIP/USPS-T34-5(e), he states "For example, for Nonprofit publications in mailing size ranging from 1-1000, 35.5 percent of the mailers enter 50 percent or more of their mail at either DDU, DSCF or Zones 1&2." With respect to this statement, please provide the Postal Service's best estimate of the percent of Periodicals pieces that are shipped by these non-profit mailers (or by any non-profit mailers whose mailing size is 1000 or less) on pallets.

RESPONSE:

To my knowledge the Postal Service does not maintain data on the containerization of individual Nonprofit Periodicals. However from the data collected for LR-J-114, none of the publications sampled with an estimated issue size less than 1,000 pieces used pallets in the sampled mailings.

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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