

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 POSTAL SERVICE
WITNESS HARAHUSH TO QUESTION POSED AT HEARING
(December 19, 2001)

During oral cross-examination, witness Harahush was asked to provide information after his appearance on the stand. The requested information is herewith provided.


See Tr. 3/373-374.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Richard T. Cooper

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(202) 268-2993; Fax -5402
December 19, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAUSH TO
QUESTION OF VAL-PAK RAISED BY DURING HEARINGS

Question of Val-Pak at Tr. 3/373-374:

Q But I'm not sure if you really mean that 100 percent of the stops have to have a DAL and a flat to qualify for the flat being considered a boxholder.

We know the DAL is a boxholder, but I'd be surprised if the 95 percent coverage flat would not also be a boxholder. . . Perhaps you could just provide that factoid for the record if it's not easily available.

Perhaps you could provide a response once you look [at] that up?

Response

The simplified address determines the fact that a mailpiece is a boxholder. Even if there are not enough pieces of mail for each box or family on the rural route, if the address format of the mailpiece is simplified, the mailpiece is counted as a boxholder.

DECLARATION

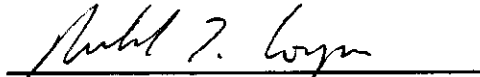
I, Thomas M. Scherer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Thomas M. Scherer
THOMAS M. SCHERER

Dated: 12-19-01

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.

A handwritten signature in cursive script, appearing to read "Richard T. Cooper", is written over a horizontal line.

Richard T. Cooper

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