

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
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-1-2)

The United States Postal Service hereby provides the responses to the following interrogatories of Association for Postal Commerce: POSTCOM/USPS-1-2, filed on December 6, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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December 20, 2001

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POSTCOM/USPS-1 Please refer to the Postal Service's response to POSTCOM/USPS-T41-3 and USPS-LR-I-165, page 55, which shows linear rates by mail shape and type. The linear rates shown on this page for originating standard flats are 4.83 pieces per pound and 115 pieces per foot.

(a) Does the linear rate for originating standard flats of 4.83 pieces per pound mean that the average originating standard flat weighs .207 (1/4.83) pounds? If your answer is not in the affirmative, please provide an explanation of the meaning of this linear rate.

(b) Does the linear rate for originating standard flats of 115 pieces per foot mean that the average originating standard flat has a thickness of .0087 (1/115) feet. If your answer is not in the affirmative, please provide an explanation of the meaning of this linear rate.

(c) Is the average density (in terms of cubic feet per inch) of originating Standard Mail flats similar (within 10 percent) to that of Bound Printed Matter (BPM) flats? If your answer is not in the affirmative, please explain all of the reasons why you believe that the density of originating Standard Mail flats is different than the average density of BPM flats.

(d) Are the average height and width of originating Standard Mail flats similar (within 10 percent) to those for BPM flats? If your answer is not in the affirmative, please explain all of the reasons why you believe that the average height and width of originating Standard Mail flats are different than the average height and width of BPM flats and provide all of the evidence that supports that belief.

(e) Please confirm that an average originating Standard Mail flat weighing 15.99 ounces has a thickness of approximately 0.5 inches. If not confirmed, please explain fully.

Response:

- a. Yes.
- b. Yes.
- c. We have not studied this issue and do not have any data supporting or denying your premise.

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- d. We have not studied this issue and do not have any data supporting or denying your premise.
- e. We have not studied this issue and do not have any data on the average thickness of flats that individually weigh almost a pound (15.99 ounces).

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POSTCOM/USPS-2 Please refer to USPS-LR-I-165 (*sic*), page 55 and your response to POSTCOM/USPS-T41-3(b), which states, "Even if there were 1.98 pound Standard flats, the cumulative average thickness of 1.98 pounds of mixed Standard flats would not say anything about the average thickness of flats that each weigh 1.98 pounds."

- (a) Please provide the coefficient of variation for the pounds per inch rate for originating standard flats of 1.98 pounds per inch.
- (b) Please provide the coefficient of variation for the 4.83 pieces per pound linear rate for originating standard flats.
- (c) Please provide the coefficient of variation for the 115 pieces per foot linear rate for originating standard flats.

Response:

The information is from USPS-LR-J-165.

- a. This information is not available.
- b. The coefficient of variation is 7.32%.
- c. This information is not available.

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.

Joseph K. Moore

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