

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2001

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Docket No. R2001-1

RESPONSE OF POSTAL SERVICE WITNESS HARAHUSH  
TO MAJOR MAILERS ASSOCIATION INTERROGATORIES  
REDIRECTED FROM WITNESS SCHENK  
(MMA/USPS-T43-23f)

The United States Postal Service hereby provides the responses of witness Harahush to the following interrogatories of the Major Mailers Association: MMA/USPS-T43-23f, filed on December 14, 2001. This subpart was redirected from witness Schenk.

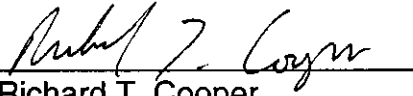
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
January 4, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH  
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION  
REDIRECTED FROM WITNESS SCHENK

**MMA/USPS-T43-23.**

Please refer to your response to Interrogatory MMA/USPS-T43-11, where you confirm that letters delivered to a post office box in not a significant carrier cost driver for the delivery costs that you derive in USPS-LR-J-117, worksheet "letters 93." You have also stated that you do not know the numbers of letters that were delivered to a post office box in FY 93 for either First-Class single piece or presorted letters, except to the extent that volume figures have been provided in response to Interrogatory MMA/USPS-3.

f. Please provide, separately, the percentage of single piece and presorted letters that were delivered by city carriers for the past 10 USPS fiscal years. If the requested data are not available for the past ten USPS fiscal years please provide the data for as many years as such data are available. Please be sure to also include the volume figures from which those percentages were computed.

**Response:**

f.

Rate	FY00	FY99	FY98	FY97	FY96	FY93
1C SINGLE PC	21308674	21486263	21860975	21760187	20700863	23815756
1C PRESORT	28757969	27349619	26256486	25082084	23494136	22324833
TOTAL MAIL	87691130	85407335	84780296	81617176	74787734	78786283
% 1C SINGLE PC	24.3%	25.2%	25.8%	26.7%	27.7%	30.2%
% 1C PRESORT	32.8%	32.0%	31.0%	30.7%	31.4%	28.3%

**DECLARATION**

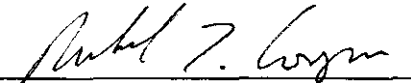
I, Thomas W. Harahush, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Thomas W. Harahush

Date: 1-4-01

**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.

  
Richard T. Cooper

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