

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 INTERROGATORIES OF THE COALITION OF RELIGIOUS PRESS
ASSOCIATIONS (CRPA) AND THE NATIONAL FEDERATION OF INDEPENDENT
PUBLICATIONS (NFIP) (CRPA-NFIP/USPS-T41-1-4) (January 18, 2002)

The United States Postal Service hereby files the response of witness L. Paul
Loetscher to the following interrogatories of the Coalition of Religious Press
Associations (CRPA) and the National Federation of Independent Publications (NFIP):
CRPA-NFIP/USPS-T41-1-4, filed on January 14, 2002.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 18, 2002

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CRPA-NFIP/USPS-T-41-1.

- (a) In your response to CRPA-NFIP/USPS-T-34-14(d), redirected to you from Witness Taufique, you report that 91 of 256 Nonprofit publications with “measurable zone distribution and an estimated issue size between 0-1,000 copies mailed more than 50 percent of there [sic] copies at DDU, DSCF or Zone 1&2 rates.” Confirm that the USPS data which are presented in this response also show that in addition to the 256 publications described above, there are also 3,974 nonprofit publications with circulation per issue of 0-1,000 which report 0 advertising percentage for all mailings in FY2000, and for which no destination entry data are currently available.
- (b) Confirm that the 91 nonprofit publications in the 0-1,000 circulation stratum which you describe as having 50% or more of copies dropshipped to DDU, DSCF or Zone 1&2 entry points represent only 2.15% of the total (4230) publications in the nonprofit publications category which have and estimated issue sizes of 0-1,000 copies per issue.

RESPONSE:

- (a) In the PERMIT system database there are 3,974 publications with estimated issue size between 0-1,000 copies paying Periodicals Nonprofit rates for all mailings in FY2000 which reported 0 percent advertising in FY2000 so the zone distribution of these publications could not be determined.
- (b) Confirmed, but this does not imply that only 2.15 percent of Nonprofit publications with issue size between 0 – 1,000 copies have 50 percent or more of their copies entered at the DDU, DSCF or within 150 miles of the destination. Some of the publications with no advertising may have over 50 percent of mailed copies entered at the DDU, DSCF or within 150 miles of their destination. The number of these publications cannot be determined since zone information is not available for publications with no advertising.

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CRPA-NFIP/USPS-T41-2.

In your response to CRPA-NFIP/USPS-T43-14(e), you refer to publications that enter mail at both Nonprofit Periodicals and Regular Periodicals rates. Please clarify how a publication can enter at both Nonprofit and as Regular Rates.

RESPONSE:

It is my understanding that a publication can enter mail at both Periodicals Nonprofit rates and Periodicals Regular rates in the same fiscal year if Nonprofit Periodicals mailing privileges are granted or revoked within the fiscal year.

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CRPA-NFIP/USPS-T41-3.

- (a) Your response to MPA/USPS-T34-2, redirected to you from Witness Taufique states that “The PERMIT system collects Postage statement data (form 3541) for roughly 95 percent of Periodicals Outside-County mail Trial Balance revenue.” What percent of total Periodicals Outside-County publications does the PERMIT system represent?
- (b) Please supply the same information requested in part (a) separately for Regular-Rate, Nonprofit, and if necessary, Science of Agriculture Publications.

RESPONSE:

- (a) I know of no USPS database that contains information on the total number of publications that entered mail at Periodicals Outside-County rates in FY 2000.
- (b) See response to CRPA-NFIP-T41-3, subpart (a).

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CRPA-NFIP/USPS-T41-4.

Your Table 1 which follows your response to MPA/USPS-T34-2, shows a total of 25,872 Periodicals mailed Outside-County in FY2000.

- (a) Of the 25, 872, how many are Nonprofit, and how many are Regular Rate?
- (b) How many periodicals are there in the Outside-County subclass in addition to the 25,872 "Permit System Periodicals Outside-County" publications listed in your table 1, MPA/USPS-T34-2?
- (c) Of the non-PERMIT periodicals, the number which is requested in part (b), how many are Regular-Rate and how many are Nonprofit? In providing this information please identify the source, form or database which you derive that information.
- (d) Please confirm that of the 25,872 publications counted by the PERMIT system as shown in table 1, 12,487 report and annual advertising percentages of 1-10% or 48.3% of the total number of outside county publications in the PERMIT database.

RESPONSE:

- (a) Of the 25,872 publications shown in Table 1 in my response to MPA/USPS-T34-2, 17,375 publications mailed all pieces in FY 2000 at Regular or Science of Agriculture rates, 8,315 publications mailed all pieces at Nonprofit rates in FY 2000, 145 publications mailed at both Regular and Nonprofit rates in FY 2000, and 37 publications mailed all pieces at Classroom rates in FY 2000.
- (b) I know of no USPS database that maintains information on the total number of publications that entered mail at Outside-County Periodicals rates in FY 2000.
- (c) See response to CRPA-NFIP/USPS-T41-4 subpart (b).
- (d) Confirmed.

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.

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