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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

: POSTAL RATE AND FEE CHANGES, 2001 : Docket No. R2001-1
:

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF DAVID POPKIN
(DBP/USPS-88)

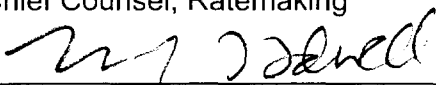
The United States Postal Service hereby provides its response to the following interrogatory directed by David Popkin on December 17, 2001: DBP/USPS-88.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 31, 2002

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TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-88

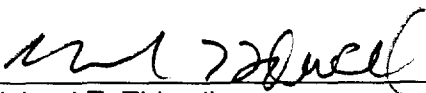
Please refer to your response to DBP/USPS-57 subparts f through h. Please respond to the interrogatory if the concept of greater cost is replaced by the concept of requiring a greater likelihood of manual processing and the concept of lower cost is replaced by the concept of requiring a greater likelihood of automated processing.

RESPONSE:

Such characteristics as relative size, machine-readability, and glossiness can affect the degree to which cards are efficiently processed. The Postal Service does not have separate data for stamped cards and post cards that permit the statement of any conclusions regarding the degree to which the processing of these card types varies on the basis of the characteristics identified in DBP/USPS-57(g) and (h). If one card type is "more uniform in size," the fact that the other is "less uniform" may ultimately be of little consequence, depending on the degree to which each type varies from some ideal and presuming that all cards meet postal size specifications. The fact that one type may be "more likely" to have a printed address may ultimately be of little consequence, depending on the magnitude of the degree to which the other type has printed addresses and the relative efficiency with which barcodes can be applied to both types. The Postal Service has no data which would permit it to determine the degree to which the use of one side of the card exclusively for the destination address, by itself, affects the degree to which cards are subjected to automated or manual processing. The Postal Service lacks data which would confirm the degree to which post cards tend to be detrimentally glossy, from a mail processing standpoint.

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.



Michael T. Tidwell

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