

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

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-3)

The United States Postal Service hereby provides its response to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-3, filed on October 9, 2002.

The 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

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October 29, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-3. For each of the annual volume ranges below, please provide the number of originators of First-Class Mail for FY 2000 and 2001.

ANNUAL VOLUME RANGES
(billions)

FROM	UP TO
1.750	More Than 1.750
1.500	1.750
1.250	1.500
1.000	1.250
0.750	1.000
0.500	0.750
0.250	0.500
Less than 0.250	

RESPONSE:

ANNUAL VOLUME RANGES
(billions)

FROM	TO	FY2000	FY2001
1.75	>1.75	0	0
1.50	1.75	0	0
1.25	1.50	0	0
1.00	1.25	1	0
0.75	1.00	0	1
0.50	0.75	2	2
0.25	0.50	19	25
< 0.25		65,044	65,038

The source of these figures is the Corporate Business Customer Information System (CBCIS). CBCIS's automated roll up of volumes is not able to capture all of a particular mailer's volume. One reason for the difference is that letter shops often pay postage

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from the letter shops' accounts. The letter shops' accounts would not be identified by the CBCIS automated roll-up as relating to the originating mailer, even if the letter shops are using unique permits for the mailer. The CBCIS system has no way of knowing that the permit was directly and solely related to one particular mailer.

The volume figures presented in this case for Capital One were obtained directly from the permit system, based on Capital One's specific identification of its permit numbers. Capital One provided the Postal Service with a list of all permits that apply uniquely to its mailings and this was the basis for the volumes presented in witness Crum's testimony.

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.

Scott L. Reiter

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