

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 WITNESS CRUM TO  
INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS WILSON  
(APWU/USPS-T4-17)

The United States Postal Service hereby provides the response of  
Witness Crum to the following interrogatory of American Postal Workers Union,  
AFL-CIO: APWU/USPS-T4-17, filed on November 14, 2002 and redirected from  
witness Wilson.

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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Nan K. McKenzie

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November 27, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM  
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
REDIRECTED FROM WITNESS WILSON

**APWU/USPS-T4-17.** Please clarify your response to APWU/USPS-T4-10.

- (a) Is the 1.23 percent figure in your answer to APWU/USPS-T4-10 an average presort letter return percentage? If not please identify what mail is included in that percentage.
- (b) Please identify the sources of the 1.23 percent figure in your answer to APWU/USPS-T4-10.
  - (1) Please confirm that the 1.23 percent figure in your answer to APWU/USPS-T4-10 includes the mail returned to sender from the CFS units (the count of which you provided in your response to OCA/USPS-T4-6), and return to sender mail worked directly by the mail processing facilities (approximately two-thirds of the total return to sender volume).
  - (2) In addition to those two sources, does the 1.23 percent figure also include mail returned to sender by the carrier as a result of a death?
  - (3) Are there any other sources or types of mail included in the 1.23 percent figure?

**RESPONSE:**

- (a) The 1.23 percent figure is the average First-Class Mail return rate.
- (b) Please refer to Attachment A, page 2, note 3 of my testimony. The source of the 1.23 percent figure is listed as USPS/LR-J-69.
  - (1) Please refer to my response to (a).
  - (2) Yes, the 1.23 percent figure includes all reasons for First-Class Mail returns.
  - (3) Yes. Please also refer to my response to OCA/USPS-T3-24(c).

## 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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Nan K. McKenzie

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