

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS SECKAR
(TW/USPS-T26-1(B))

The United States Postal Service hereby provides the response to the following interrogatory of Time Warner, Inc.: TW/USPS-T26-1(b), filed on August 26, 1997, and redirected from witness Seckar.

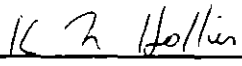
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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September 9, 1997

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES OF TIME
WARNER INC. REDIRECTED FROM WITNESS SECKAR

TW/USPS-T26-1. Please refer to USPS-LR-H-134, Section 2, Page 8. Footnotes 2 and 3 on that page claim that 75% of non-barcoded periodicals mail is machinable and only 25% is non-machinable, referring to USPS-LR-H-105.

b. Please provide an exact reference to the part of USPS-LR-H-105 which gives the machinability percentage for non-barcoded periodicals. Please also provide a summary description of how you believe that estimate was obtained, and state whether it applies to letters, flats, or both.

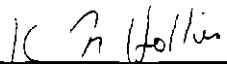
RESPONSE:

b. The reference to USPS LR-H-105 is outdated. Errata were filed on August 14, 1997, showing the correct cite to be USPS LR-H-190. Researching this answer also uncovered what appears to be no more than a typographical error in USPS LR-H-190. Page seven incorrectly indicates that, "Across all presort levels, **74 percent** of all non-carrier route, nonbarcoded pieces are machinable," [emphasis added] when the correct figure -- which witness Seckar used (see USPS LR-H-134, section 2, page 8) -- is **75 percent**. An appropriate erratum to the library reference will be filed.

The machinability factor is flat-specific and obtained as follows. The non-Centralized Postage Payment portion of the survey records machinability for sampled containers. The Centralized Payment Portion classifies all newspapers as non-machinable, while other periodicals are classified as machinable. The data are segmented by machinability and inflated using the same methods described in the library reference.

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.



Kenneth N. Hollies

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