

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

RECEIVED
SEP 12 4 48 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF AMERICAN BANKERS ASSOCIATION
(ABA/USPS-T32-3)**

The United States Postal Service hereby files this revised response to the following interrogatory of American Bankers Association: ABA/USPS-T32-3.

The original response was filed on September 2, 1997. The revised response supersedes that response.

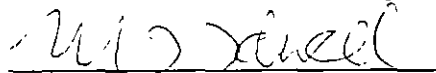
The interrogatory is stated verbatim and is followed by the revised response.

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
(202)268-2998/FAX: -5402
September 12, 1997

REVISED RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES
OF THE AMERICAN BANKERS ASSOCIATION (ABA)
REDIRECTED FROM WITNESS FRONK

ABA/USPS-T32-3. On page 20 of your testimony, lines 16-22, you discuss the rationale for using bulk metered mail as a benchmark for worksharing discounts in First Class. Please provide annual historical data from 1975 through 1996 on the volume of bulk metered mail.

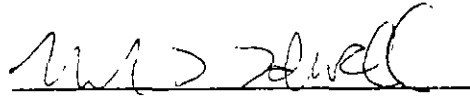
RESPONSE: No data are available which separate bulk metered letters that paid the single-piece rate from nonbulk metered letters that paid the single-piece rate. Available data which include both bulk and nonbulk metered letters are presented below. Postal Service data for metered letters which paid the single-piece (or nonpresort) rate are not available prior to Postal Quarter 2 of 1992. In addition, the percentage data below are from ODIS. These percentages were then applied to total number of nonpresort pieces by year from Table 3 of witness Fronk's testimony (USPS-T-32).

	<u>% of Nonpresort (Letters, Flats & Parcels) that is Metered Letters</u>	<u>Number of Nonpresort Metered Letters (millions)</u>
FY 1992	37.90%*	20,828
FY 1993	37.43	20,661
FY 1994	37.16	20,457
FY 1995	35.10	19,283
FY 1996	35.05	18,978

* Percentage based on Postal Quarters 2-4 only.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1145
September 12, 1997