

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  
WITNESS MODEN TO INTERROGATORIES OF  
THE NATIONAL NEWSPAPER ASSOCIATION  
(NNA/USPS-T4-1-6)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the National Newspaper Association: NNA/USPS-T4-1-6, filed on September 5, 1997.

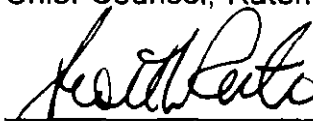
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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September 17, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
TO INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION

NNA/USPS-T4-1. Please provide data indicating by piece, weight and total volume the amount of within-county mail sorted by flat-sorting machines during the base year.

**Response:**

Piece characteristics, including class and/or subclass of mail, are not recorded for mail that is processed on the flat sorting machines. Consequently, I am unable to provide you with the information you requested.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
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NNA/USPS-T4-2. Please provide data indicating by piece, weight and total volume the projected amount of with-county periodicals volume projected for flat-sorting during the test year.

**Response:**

See response to NAA/USPS-T4-1.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
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NNA/USPS-T4-3. Please provide data indicating what proportion of within-county mail volumes was letter-shaped as opposed to flat-shaped during the base year. If you cannot provide data, please confirm that the subclass is heavily dominated by flat-shaped mail.

**Response:**

The proportion of in county mail volumes that were letter shaped as opposed to flat shaped during the base year is unknown. However, I am told that proportion of mail volumes for all Periodicals that were letter shaped as opposed to flat shaped during the base year can be found on page I-4 of library reference H-129. That information reflects that 90% of all Periodical mail is flat shaped. Based on that information and my personal experience, I confirm that the subclass is heavily dominated by flat-shaped mail.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
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**NNA/USPS-T4-4.** Please provide data indicating by piece, weight and total volume of the amount of within-county mail sorted by letter-sorting machines during the base year.

**Response:**

See the response to NNA/USPS-T4-1. The same is also applicable to letter sorting machines.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN  
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NNA/USPS-T4-5. Please confirm that MPFSM 1000 machines were not in use during the base year and that within-county mail that appeared within the machinable sorts for flats during that year would have been sorted by MPFSM 881 machines. If you cannot confirm, please explain.

**Response:**

The first part of your statement is not confirmed. I have been told that the first FSM 1000 was deployed in Tampa, Florida on July 12, 1996. The second part of your statement is confirmed in that, with the exception of mail sorted in Tampa, in-county mail that appeared within the machinable sorts for flats during the base year would have been sorted by MPFSM 881 machines.

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NNA/USPS-T4-6. Please confirm that MPFSM 881 machines are unable to sort periodicals printed on newsprint. If you are unable to confirm, please explain the circumstances in which a periodical printed on newsprint would be sortable by an MPFSM 881.

**Response:**

Not confirmed. MPFSM 881 machines are able to sort pieces that meet the automation compatibility requirements specified in section C820 of the DMM. A periodical printed on newsprint, such as one contained in a wrapper, could be processed on the FSM 881 if the flat also met the other automation compatibility requirements.

**DECLARATION**

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J Moden

Dated: 9/17/97



**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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Scott L. Reiter

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