

OFFICE OF THE SECRETARY
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
:

**NATIONAL ASSOCIATION OF PRESORT MAILERS
INTERROGATORIES TO USPS WITNESS MODEN
(NAPM/USPS-T4-1&2)
(September 17, 1997)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the National Association of Presort Mailers hereby submits these interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person. If data requested are not available in the exact format or level of detail requested, any data available in a substantially similar format or level of detail or susceptible to being converted to the requested format and detail should be provided.

NAPM\USPS-T4-1.

At page 10 of your testimony you set forth the percentage of all non-carrier route flats which were barcoded in Fiscal Year 1995, Fiscal Year 1996, and through AP9 Fiscal Year 1997. Please break out these percentages by First-Class flats and Standard flats.

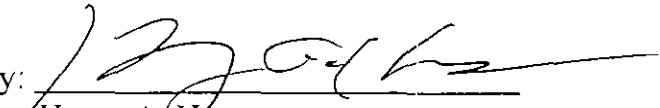
NAPM/USPS-T4-2.

Please confirm that the USPS does want to increase the percentage of First-Class flats which are delivered to the USPS with a bar code. If you do not so confirm, reconcile your answer with the testimony of USPS Witness Daniel, who at Exhibit USPS-29C, page 1 of 6, estimated first-class unit costs of automated 3/5 Digit flats at 17.8857¢ as compared to single piece flats at 40.9560¢.

Respectfully submitted,

NATIONAL ASSOCIATION OF
PRESORT MAILERS
Through Its Counsel

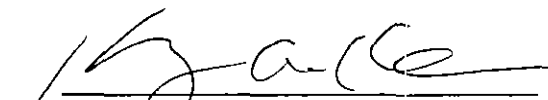
HAZEL & THOMAS, P.C.

By: 
Henry A. Hart

Date: September 17, 1997
Alexandria, Virginia

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

September 17, 1997

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