

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

**REVISED RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-T23-8 AND 9)**

The United States Postal Service hereby files the revised responses of witness Miller to the following interrogatories of Douglas Carlson: DFC/USPS-T23-8 and 9. The original responses, filed on Septmebr 11, 1997, contained inaccurate transcriptions of the questions. The revised versions being filed today merely correct those transcription errors.

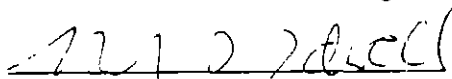
Each interrogatory is now stated verbatim and is followed by the response.

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
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September 16, 1997

**REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T23-8. Comparing stamped cards with private post cards, please confirm that private post cards are less likely than stamped cards to cause processing problems for the OCR and RBCS that are due to extraneous matter in the bar-code clear zone or the OCR read area.

RESPONSE:

This response assumes that "stamped cards" refers to cards which can be purchased from the USPS where the proper postage has already been affixed to the mail piece.

"Private post cards" is assumed to refer to those post cards where individuals affix the postage to the mail piece themselves.

Stamped card and private post card users are responsible for addressing each mail piece themselves and, if the bar code zone is not clearly marked on the mail piece, can either write an address by hand or affix a label in a manner that interferes with the bar code clear zone. As a result, both stamped cards and private post cards can experience a processing problem because extraneous matter encroaches into this area.

**REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER
TO INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-T23-9. Comparing stamped cards to private post cards, please confirm that stamped cards, on average, pose fewer obstacles to automated processing than private post cards and, therefore, can be processed at a lower cost than private post cards.

RESPONSE:

This response assumes that "stamped cards" refers to cards which can be purchased from the USPS where the proper postage has already been affixed to the mail piece.

"Private post cards" is assumed to refer to those post cards where individuals affix the postage to the mail piece themselves.

It seems that both mail pieces could possibly contain extraneous matter which might interfere with the Postnet bar code and/or the ID tag bar code. On the address side of the mail piece, as discussed in my response to DFC/USPS-T23-8, it is possible that both types of cards might contain Postnet bar code interference depending on where the address is placed by the user. In addition, the reverse side of these mail pieces would contain either text/graphics (stamped cards) or pictures/graphics (private post cards) - both of which could interfere with the ID tag bar code. I have not studied what any related mail processing cost differences might be between these two types of cards.

DECLARATION

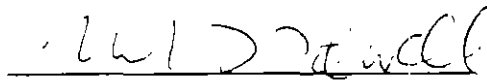
I, Michael W. Miller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Michael W. Miller

Dated: 9-16-97

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.


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
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September 16, 1997