

# DOCKET SECTION

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 INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS DEGEN  
(OCA/USPS-T12-44-49)

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T12-44-49, filed on September 9, 1997, and redirected from witness Degen. Each interrogatory is stated verbatim and is followed by the response.

These responses were due to have been filed yesterday, September 23. Unfortunately, the Law Department's computers were taken down for emergency

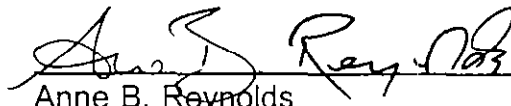
service all afternoon yesterday, and a response could therefore not be prepared until today. The Postal Service regrets this unavoidable delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

  
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September 24, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-44. Please provide the average miles per piece (i.e., total miles divided by total pieces) separately for Special Fourth Class rate and for Library rate mail.

RESPONSE:

Please see response to OCA/USPS-T12-47.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-T12-45. Please provide the average length of haul (similar to Form 12 information) for Special Fourth Class rate and for Library rate mail.

RESPONSE:

Please see response to OCA/USPS-T12-47 and -48.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-T12-46. Which postal data collection systems collect information on the total or average number of miles traveled by Special Fourth Class rate and Library rate mail, respectively?

RESPONSE:

None of our systems collect such information. ODIS data collected subsequent to the implementation of Classification Reform, in July 1996, can be used to estimate great circle distances.

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-T12-47. Does the Postal Service collect ODIS information on  
Special Fourth Class rate (SFCR) mail?

- a. If so, can such information be used to determine average distances traveled by SFCR?
- b. If these questions are answered affirmatively, then please provide ODIS-derived information on the average distance traveled by SFCR.

RESPONSE:

Yes, since the implementation of Classification Reform, in July 1996.

- a. No.
- b. N/A

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-T12-48. Does the Postal Service collect ODIS information on Library rate (LR) mail?

- a. If so, can such information be used to determine average distances traveled by LR?
- b. If these questions are answered affirmatively, then please provide ODIS-derived information on the average distance traveled by LR.

RESPONSE:

Yes, since the implementation of Classification Reform, in July 1996.

a. No.

b. N/A

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T12-49. Which Postal Service data systems measure mileage by great circle distances?

- a. Can any of them be used to determine the total or average distances traveled by Special Fourth Class rate (SFCR) and/or Library rate (LR) mail? Please explain.
- b. If so, please provide total or average distances traveled by SFCR and LR mail derived from such systems.

RESPONSE:

ODIS data can be used to measure mileage by great circle distances.

- a. No. Great circle distances may be substantially different from total or average distances. Please see response to OCA/USPS-T12-47-48.
- b. N/A.



**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.

  
Anne B. Reynolds

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