

# DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
NASHUA, DISTRICT, MYSTIC & SEATTLE INTERROGATORIES  
( NDMS/USPS-1 AND 2)**

The United States Postal Service hereby files its response to the following interrogatories of Nashua, District, Mystic & Seattle, dated September 12, 1997: NDMS/USPS-1 and 2.

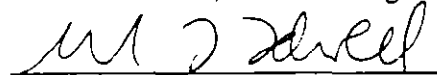
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
September 26, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.,  
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC. (NDMS)**

**NDMS/USPS-1.** Please refer to your response to NDMS/USPS-T32-24, redirected from witness Fronk.

- a. Please furnish a copy of the July 13, 1972 entitled JITCO, "A Special Analysis of *Nonstandard Physical Attributes, by Weight Increment, for First-Class and Airmail Letters and Cards*" as a library reference.
- b. NDMS/USPS-T32-24(b) requested "the time period from which the raw data underlying these percentages [which LR-H-112 relied upon] were compiled or derived." Your response provided the date of the report which published the data. Please respond to the question, which asked for the time period from which the raw data were compiled or derived.

**RESPONSE**

- a. The report was filed as Library Reference-3 in Docket No. R78-1.
- b. It is unclear from the report exactly when the raw data were compiled or derived. Presumably, the data are from FY71 or FY72.

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**NDMS/USPS-2.**

Please refer to your responses to NDMS/USPS-T32-29(a), and NDMS/USPS-T32-8(e), both redirected from witness Fronk.

- In your response to NDMS/USPS-T32-29(a), you appear to state that **24.9 million** First-Class single piece parcels weigh 1 ounce or less.
  - In your response to NDMS/USPS-T32-8(e), you state that, of the total volume of First-Class single piece parcels that were used to estimate an average cost of \$0.7457, 0.8 percent were one ounce or less. Assuming the cross-section of parcels selected to estimate the average cost for the nonstandard surcharge to be representative of the distribution of single piece parcels in First-Class, approximately 0.8 percent of all First-Class single piece parcels should be one ounce or less.
  - Base Year volumes for First-Class single piece parcels were not found. However, LR-H-129, at page II-3, estimates total FY1998 (with reclassification reform) First-Class single piece parcel volume to be 451,446,000. Assuming this estimate is accurate, and approximately 0.8 percent of all First-Class single piece parcels are one ounce or less, then approximately **3.6 million** First-Class single piece parcels would be one ounce or less during Fy1998.
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- a. Does the "1996 Nonstandard Volume" which you provided in response to NDMS/USPS-T32-29(a)-(b) include First-Class single piece mailpieces weighing more than one ounce?
  - b. If so, are such mailpieces considered to be subject to the nonstandard surcharge? Please explain any affirmative answer.
  - c. If not, please confirm that there were 24.9 million First-Class single piece parcels weighing one ounce or less during 1996, and provide the source of this estimate.
  - d. If confirmed, please reconcile the total 1996 volume of single piece parcels weighing one ounce or less (24.9 million) with the identified percentage of single piece parcels weighing one ounce or less (0.8 percent) selected to calculate per piece parcel cost used to calculate the First-Class single piece nonstandard surcharge.
  - e. Please provide the numerator and the denominator used to determine that 0.8 percent of all single piece First-Class parcels are one ounce or less.

**RESPONSE**

- a. No.
- b. N/A
- c. As shown in NDMS/USPS-T32-29b, there are 24.9 million First-Class single piece nonstandard parcels. Note that part e below indicates that the 1996 volume of single-piece parcels weighing one ounce or less was 36.0 million pieces. Since one-ounce parcels are nonstandard by definition one would expect these two numbers to be

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about the same. This difference may be due to postal personnel not recognizing a piece as nonstandard during acceptance or data collection.

d. The 0.8 percent figure is an error. It was the percentage of total weight accounted for by the first ounce category, not the percentage of total volume accounted for by the first ounce category as requested. The correct figure is 8.0 percent. A correction to the response to NDMS/USPS-T32-8(e) will be filed.

e. 15.6 million/1,924.2 million for the 0.8 percent figure  
36.0 million/449.5 million for the corrected 8.0 percent figure.

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.

  
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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
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September 26, 1997