

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268B0001

EXPERIMENTAL PRIORITY MAIL FLAT-RATE
BOX, 2004

Docket No. MC2004-2

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LOETSCHER TO INTERROGATORIES OF DAVID B. POPKIN
(DBP/USPS-T3-1-6)
(July 8, 2004)

The United States Postal Service hereby files witness Loetscher's responses to interrogatories of David B. Popkin: DBP/USPS-T3-1-6, filed on June 24, 2004.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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DBP/USPS-T3-1. Please refer to Page 2 of USPS-LR-2/MC2004-2 and advise the proper volume for Phoenix AZ.

RESPONSE:

On page 2 of USPS-LR-2, ODIS destinating Priority Mail volume for Phoenix should be 14,851,957, not 14,8511,957, as originally presented in the table. An appropriate erratum will be filed.

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DBP/USPS-T3-2. [a] Please refer to Pages 1 and 2 of USPS-LR-2/MC2004-2, please provide specific details on how the sample sites were chosen. [b] Please confirm, or explain if you are not able to confirm, that there are no locations in the continental United States [lower 48 states] that are within the 8th Zone for the Kansas City and Wichita sites. [c] Do you believe that this had an effect on your study? Please provide your reasons for this belief.

RESPONSE:

[a] As stated in USPS-LR-2, page 1, the sample sites were randomly selected with probability proportional to total ODIS destinating Priority Mail volume for FY 2002. The ten sample sites selected were chosen by first sorting the 470 sites by ODIS destinating Priority Mail volume in descending order. Then the cumulative proportion of destinating Priority Mail volume for each site was calculated using the formula:

$$\text{Cumulative percent}_j = \frac{\sum_{i=1}^j \text{volume}_i}{\sum_{i=1}^{470} \text{volume}_i}$$

The Excel RAND() function was then used to produce 10 random numbers. A site was chosen for sampling if the random number chosen was less than the site's cumulative percent but greater than the cumulative percent of the previous site.

[b] Confirmed.

[c] The fact that "no locations in the continental United States are within the 8th Zone for the Kansas City and Wichita sites" does not have an effect on the study. The study was intended to provide national estimates of size distributions and density for Priority Mail parcels. The sampling procedure employed was designed to give all destinating Priority Mail parcels an equal probability of selection.

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DBP/USPS-T3-3. Since you only utilized 5,368 sample pieces, please describe in detail the sampling procedure that you utilized at each of the sites.

RESPONSE:

The attached document is the detailed sampling instructions given to data collection teams for this study. This document describes in detail the issues to be discussed at each site with operations personnel to determine the location of sampling and to identify the universe from which to sample. The document also describes the sampling procedures to be employed and the suggested skip rates.

Each team was staffed with at least one individual experienced in sampling techniques. This individual was charged with the responsibility of working with the Postal Service representative at each site to understand the flows of all Priority Mail parcels through the facility and to design a site-specific sampling procedure that was both consistent with the study design and could be conducted safely with minimal interference with Priority Mail operations.

In most cases Priority Mail arriving at the facility was brought into a staging area before the mail was dispatched to either the SPBS or manual operations. Sampling was conducted at or near the staging area when it could be conducted safely and when destinating parcels for the sample site could be identified. Sampling was conducted as described in the instructions. In these cases we requested that platform personnel be informed of the study and all Priority Mail to be worked in the facility be brought to the staging area so that the appropriate skip rates could be applied and selected containers sampled.

When space, safety or operational considerations precluded sampling mail prior to sortation operations, or when the mail destinating at the sample site could not be separately

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identified from other mail processed at the facility, sampling was conducted as mail was dispatched from the sortation operations.

Priority Density Survey Data Collection Instructions

A. General Information

In this study you will collect data on sample Priority Mail pieces destinating in the SCF service territory of the sample plant. Data will be collected over a two-day period (approximately 8 hours each day). Included in the sample are flats, IPPs (irregular parcels), parcels, and Priority reshipe sacks. You will be collecting data on piece characteristics (weight, dimensions, indicia used, postage paid) and on transportation flows (origin and destinating ZIP code, whether air transportation was used).

The data collected in this survey could be used in the rate making process, so proper data collection procedures must be followed.

The following supplies are needed for the surveys:

Supplies Provided:	Other Supplies Needed:
Laptop with data entry software	LRCA shirts (see Teresa if don't have one)
Scale	Pens
Tape measures (2)	
Clipboards (2)	
LRCA bag	
Data Collection Forms (backup)	

B. Before The Site Visit

The survey coordinators will make preliminary plans for each site visit. Site contacts will be notified, and a time will be arranged for an on-site meeting with the site contact, including a tour of the Priority operations. General information on the processing of destinating Priority Mail will be obtained from the site prior to your visit.

C. On-Site

Operations Tour

At the beginning of the site visit, your team will meet with the site contact (or a designated representative) and obtain specifics on operations. In particular, you need to verify what operations process destinating Priority Mail, what times those operations are worked, and when mail is staged for processing (when incoming mail received). You will also need to find out what resources (i.e., personnel) are available to determine transportation modes. A list of questions to guide you during your site visit is provided in the Appendix.

With this information, each survey team will develop a detailed data collection plan. This plan should include what times data collection will occur at each operation where destinating Priority Mail is sorted.

Sampling Procedures

The guiding principle for sampling is to isolate mail destinating in the sample site's destinating service territory. When possible, mail is to be sampled before sortation in the incoming secondary operation at the plant, annex or Priority Mail Processing Center (PMPC). Generally, you will run into one of two situations:

- IS at the plant or annex: In this situation it should be straightforward to sample pieces before they are processed in the incoming secondary operation.
- IS at the PMPC: if Priority Mail is processed at a PMPC, generally you cannot sample this mail at the destinating plant, since it will be cross-docked at the plant with little time for sampling. Sampling at the plant would therefore result in interruption to operations, or could delay mail because the sample pieces would have to be resorted. In this case, sampling will need to be done at the PMPC. The point in the processing in which mail destinating in our sample site's territory can be isolated will depend on the sort schemes used at the PMPC.

In either case, the universe of mail to be sampled from includes any destinating Priority Mail that arrived at the survey site since close-out of the previous day.

In selecting sample pieces, use the following sampling rates:

- Select every third container (rolling stock, pallet)
- Select every tenth piece or item (sack or tub) in each sample container
- Select every piece in each sample item (sack or tub)
- Select every piece in the nonmachinable outsides (NMO) operation

Mark containers already sampled from to avoid double counting.

For loose pieces and items in a container, start counting at the front right corner, and count through clockwise.

After selecting sample pieces, release the non-sampled pieces to operations before recording sample piece information. Sampling should interfere with operations as little as possible. If possible, get to the site early enough to select sample pieces from staged mail before sortation begins. In order to avoid double counting, missing mail flows, or interfering with operations, sampling should be done before the mail is sorted. When arriving to sample, even if the operation is not running at the time, check to see whether mail was sorted earlier in the day. These pieces would need to be sampled if they arrived that day.

If Priority reship mail is received by the site, it may not be processed in the Priority Mail operation. For example, a Priority reship sack may be received in the business mail entry unit (BMEU) and then dumped and its contents sent to the appropriate processing operation (e.g., flat sorting machine). During the initial meeting with the site contact, determine what happens with Priority reship mail at the site. If it bypasses the Priority processing operations, then make arrangements to be contacted if any arrives so it can be sampled or provide a paper data form for the BMEU clerk to fill out for us. Every Priority reship item received should be sampled; make an indication in the “Notes” area that the entry is Priority reship.

Data to collect

You will be entering the data directly into an Access database. If the laptop or software is not working, paper data entry forms have been provided as backup. If using the paper forms, it is important to consecutively number the observations on the form.

The following data are to be recorded for each sample piece, unless otherwise noted:

- Site
- Data collectors
- Shape: flat or parcel (IPPs included as parcels); flats are pieces with the following dimensions: All other pieces should be parcels.
- Transportation: This may be determined by the container labels (see explanation below) or from the Priority manager or transportation and logistics manager. Choices are: FedEx Air, Commercial Air (i.e., non-FedEx air), Air-Unknown, Surface Only, Unknown.
- Indicia: permit imprint (PI), stamp (ST), meter (MT), postage validation imprint (PV). PVs are USPS-applied meter-like indicia.
- Postage: record postage paid if available on the mail piece.
- Origin Plant: if available from container or sack label; otherwise record “NA”
- Origin ZIP Code: record ZIP Code (3 or 5-digit) from postal label if available, otherwise record ZIP Code from return address.
- Destination ZIP Code: record the 5-digit ZIP Code shown on the address label
- Weight: in pounds

- Length: in inches; for parcels, length is the longest dimension; not recorded for flats
- Width: in inches; for parcels, the shorter dimension on the side with the address; not recorded for flats
- Height: in inches; for parcels, the remaining side; not recorded for flats
- Girth: distance around the thickest part (perpendicular to the length). in inches; recorded for non-box shaped parcels, along with length; not recorded for flats
- Notes: if using the paper forms, write any notes on the back of the page, referencing the observation number

How to determine transportation

One important aspect of this survey is the determination of whether air transportation was used to transport the sample pieces. There are several sources to use to make this determination:

- ACT tag: the ACT tag provides information on transportation modes between plants. See page 6 in the Appendix.
- Labels on rolling stock: see pages 8-9 in the Appendix.
- Transportation flows models: for most plants, any mail originating within 300 miles of the plant will be transported to the plant by surface transportation. Other surface transportation routes can be determined from information provided by the Priority manager or transportation and logistics manager.
- Other: If you have any questions, ask the Priority or Transportation/Logistics manager.

Backup Copies

When data entry for a day is completed, save a copy of the database to the backup diskette provided. If possible, after data collection is completed, email a copy of the database to Kaz (kgunay@lrca.com).

C. After The Site Visit

All materials should be returned to Leslie, unless otherwise instructed. Any unusual situations should be reported to Leslie or Paul L. ASAP.

Appendix

List of Questions for the Priority Survey

1. In what operations is Priority Mail destinating in the SCF service territory sorted in?
 - Manual
 - Small parcel bundle sorter (SPBS)
 - Linear integrated parcel sorter (LIPS)
 - Nonmachinable outsides (NMO)
 - Other
2. Where are these operations located in the plant/annex?
3. When is Priority Mail destinating in the SCF service territory sorted in each operation?
4. When is Priority Mail destinating in the SCF service territory staged for sortation (when does it arrive in the plant)?
5. When is Priority Mail destinating in the SCF service territory dispatched?
6. Does Priority reship mail get handled in the Priority sortation operation, in the BMEU, on the dock, or in some other area? Can you be notified when it arrives so that it can be sampled, or can someone in the plant get the information for you (if provided a copy of the survey forms)?
7. What are all the ways that the plant receives destinating Priority Mail: does the plant receive destinating Priority Mail from another plant that is transported directly by truck/surface transportation? Does the plant receive destinating Priority Mail directly from FedEx? Does the plant receive destinating Priority Mail directly from another plant/AMC that receives mail directly from FedEx?
8. Who is (are) the contact(s) for questions concerning transportation flows?
9. Get instructions for building entry (badges, if used), directions to restrooms, etc.

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DBP/USPS-T3-4. You indicated that you recorded the dimensions of the sample piece by recording either the length, width, and height OR the length and girth. Please indicate how you were able to determine the volume of a sample parcel if you only knew the length and girth.

RESPONSE:

Girth was recorded for only those parcels without readily defined width, length and height (e.g., tube-shaped parcels, soft (un-boxed) packages with items such as clothing). In the sample, girth was recorded for only 222 parcels (4.1 percent). For these parcels we assumed that girth dimensions were square for purposes of calculating cubic volume (i.e, a parcel with a girth of 20 was assumed to have a length and width of 5). The assumption that the girth dimension was circular was also considered. The circular assumption yields a maximum volume for a given girth. Since the circular assumption tends to over-estimate the cubic volume for a given girth it was decided to use the assumption of square girth.

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DBP/USPS-T3-5. In your testimony, you provide six Tables. [a] Table 1 is designated Zones 1-3. Does this also include local mail? [b] If not, where was local mail tabulated? [c] There are a total of 2100 cells in all six tables. This provides an average of only 2.56 parcels per cell. While I realize that all cells are not equally populated, please provide copies of the six Tables showing the number of samples in each of the 2100 cells.

RESPONSE:

- [a-b] Sampling of Priority Mail parcels was conducted at the mail processing facility or PMPC that generally performs incoming secondary operations on Priority Mail parcels. To the extent that local Priority Mail passes through these operations it would be included in the study as Zone 1-3 mail. As acknowledged on page 1 of USPS-LR-2, sampling in this manner possibly excludes parcels that originate and destinate in the same five-digit area. It is my understanding based on information from postal officials that this volume is negligible.
- [c] See attached tables.

Table 1
Sample observations Zones 1-3

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	201	94	50	8	14
2	135	148	133	29	95
3	34	61	43	25	87
4	11	22	20	6	65
5	0	12	14	2	52
6	1	3	9	1	34
7	0	4	6	0	17
8	0	0	3	0	19
9	0	0	1	1	12
10	0	0	3	2	12
11	0	0	0	1	9
12	0	0	0	1	16
13	0	0	1	0	9
14	0	0	0	0	7
15	0	0	0	0	9
16	0	0	0	0	11
17	0	0	0	0	5
18	0	0	0	0	8
19	0	0	0	0	4
20	0	0	0	0	7
21	0	0	0	0	3
22	0	0	0	0	4
23	0	0	0	0	6
24	0	0	0	0	5
25	0	0	0	0	2
26	0	0	0	0	3
27	0	0	0	0	2
28	0	0	0	0	2
29	0	0	0	0	2
30	0	0	0	0	1
31	0	0	0	0	2
32	0	0	0	0	1
33	0	0	0	0	3
34	0	0	0	0	1
35	0	0	0	0	1
36	0	0	0	0	1
37	0	0	0	0	1
38	0	0	0	0	2
39	0	0	0	0	0
40	0	0	0	0	1
41	0	0	0	0	1
42	0	0	0	0	0
43	0	0	0	0	0
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	0
48	0	0	0	0	0
49	0	0	0	0	0
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	0
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	0
57	0	0	0	0	0
58	0	0	0	0	1
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	0
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	0
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	0
69	0	0	0	0	0
70	0	0	0	0	0

Table 2
Sample observations Zone 4

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	86	57	30	2	8
2	45	65	74	16	37
3	9	13	30	14	53
4	3	7	8	2	48
5	1	1	5	4	37
6	0	2	1	1	18
7	0	1	0	2	15
8	0	0	1	0	20
9	0	0	0	0	9
10	0	0	0	0	12
11	0	0	0	1	9
12	0	0	0	0	5
13	0	0	0	0	9
14	0	0	0	0	7
15	0	0	0	0	5
16	0	0	0	0	3
17	0	0	0	0	4
18	0	0	0	0	4
19	0	0	0	0	2
20	0	0	0	0	1
21	0	0	0	0	1
22	0	0	0	0	1
23	0	0	0	0	0
24	0	0	0	0	1
25	0	0	0	0	0
26	0	0	0	0	1
27	0	0	0	0	0
28	0	0	0	0	2
29	0	0	0	0	1
30	0	0	0	0	0
31	0	0	0	0	0
32	0	0	0	0	0
33	0	0	0	0	1
34	0	0	0	0	0
35	0	0	0	0	1
36	0	0	0	0	1
37	0	0	0	0	0
38	0	0	0	0	2
39	0	0	0	0	0
40	0	0	0	0	0
41	0	0	0	0	1
42	0	0	0	0	0
43	0	0	0	0	0
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	0
48	0	0	0	0	0
49	0	0	0	0	1
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	1
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	0
57	0	0	0	0	0
58	0	0	0	0	0
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	1
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	0
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	0
69	0	0	0	0	0
70	0	0	0	0	0

Table 3
Sample observations Zones 5

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	125	87	36	5	4
2	53	99	68	39	45
3	7	21	23	23	57
4	3	11	15	8	52
5	0	2	13	1	33
6	0	0	5	0	24
7	0	0	1	1	26
8	0	0	1	0	25
9	0	0	0	0	11
10	0	0	0	0	15
11	0	0	0	0	15
12	0	0	0	0	9
13	0	0	0	0	12
14	0	0	0	0	5
15	0	0	1	0	7
16	0	0	0	0	8
17	0	0	0	0	6
18	0	0	0	0	4
19	0	0	0	0	3
20	0	0	0	0	3
21	0	0	0	0	4
22	0	0	0	0	1
23	0	0	0	0	3
24	0	0	0	0	2
25	0	0	0	0	4
26	0	0	0	0	1
27	0	0	0	0	2
28	0	0	0	0	0
29	0	0	0	0	3
30	0	0	0	0	6
31	0	0	0	0	0
32	0	0	0	0	0
33	0	0	0	0	1
34	0	0	0	0	0
35	0	0	0	0	2
36	0	0	0	0	0
37	0	0	0	0	0
38	0	0	0	0	0
39	0	0	0	0	1
40	0	0	0	0	1
41	0	0	0	0	0
42	0	0	0	0	0
43	0	0	0	0	1
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	1
48	0	0	0	0	0
49	0	0	0	0	0
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	0
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	0
57	0	0	0	0	0
58	0	0	0	0	0
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	0
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	0
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	0
69	0	0	0	0	0
70	0	0	0	0	0

Table 4
Sample observations Zone 6

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	91	75	21	4	4
2	32	81	70	20	31
3	9	23	24	8	44
4	1	3	12	2	39
5	0	4	1	1	21
6	0	1	3	1	21
7	0	0	0	0	20
8	0	1	0	0	15
9	0	1	0	0	14
10	0	0	0	0	9
11	0	0	0	0	6
12	0	0	0	1	2
13	0	0	0	0	7
14	0	0	0	0	4
15	0	0	0	0	2
16	0	0	0	0	2
17	0	0	0	0	2
18	0	0	0	0	3
19	0	0	0	0	1
20	0	0	0	0	3
21	0	0	0	0	0
22	0	0	0	0	0
23	0	0	0	0	0
24	0	0	0	0	1
25	0	0	0	0	1
26	0	0	0	0	2
27	0	0	0	0	2
28	0	0	0	0	1
29	0	0	0	0	0
30	0	0	0	0	1
31	0	0	0	0	1
32	0	0	0	0	1
33	0	0	0	0	0
34	0	0	0	0	0
35	0	0	0	0	0
36	0	0	0	0	0
37	0	0	0	0	0
38	0	0	0	0	0
39	0	0	0	0	0
40	0	0	0	0	0
41	0	0	0	0	0
42	0	0	0	0	0
43	0	0	0	0	0
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	0
48	0	0	0	0	0
49	0	0	0	0	0
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	1
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	0
57	0	0	0	0	0
58	0	0	0	0	0
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	0
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	1
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	0
69	0	0	0	0	0
70	0	0	0	0	0

Table 5
Sample observations Zone 7

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	55	31	9	1	2
2	13	31	30	11	15
3	3	12	9	3	19
4	0	1	6	2	15
5	0	1	3	1	15
6	0	0	0	0	19
7	0	0	0	0	9
8	0	0	2	2	10
9	0	0	0	0	4
10	0	0	0	0	9
11	0	0	0	0	8
12	0	0	0	0	4
13	0	0	0	0	4
14	0	0	0	0	2
15	0	0	0	0	2
16	0	0	0	0	3
17	0	0	0	0	2
18	0	0	0	0	2
19	0	0	0	0	1
20	0	0	0	0	0
21	0	0	0	0	1
22	0	0	0	0	1
23	0	0	0	0	0
24	0	0	0	0	2
25	0	0	0	0	4
26	0	0	0	0	0
27	0	0	0	0	0
28	0	0	0	0	2
29	0	0	0	0	1
30	0	0	0	0	2
31	0	0	0	0	1
32	0	0	0	0	0
33	0	0	0	0	0
34	0	0	0	0	0
35	0	0	0	0	0
36	0	0	0	0	0
37	0	0	0	0	0
38	0	0	0	0	1
39	0	0	0	0	0
40	0	0	0	0	0
41	0	0	0	0	0
42	0	0	0	0	1
43	0	0	0	0	0
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	0
48	0	0	0	0	0
49	0	0	0	0	0
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	0
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	0
57	0	0	0	0	0
58	0	0	0	0	0
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	0
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	0
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	0
69	0	0	0	0	0
70	0	0	0	0	0

Table 6
Sample observations Zone 8

Weight to: (Pounds)	0 to 0.1	0.1 to 0.2	0.2 to 0.3	0.3 to 0.34	Over 0.34
1	97	49	21	3	7
2	37	63	42	12	34
3	7	16	12	12	46
4	0	3	10	4	44
5	0	1	5	2	26
6	0	0	3	1	33
7	0	1	0	0	25
8	0	0	1	0	18
9	0	0	1	0	15
10	0	0	0	1	7
11	0	0	0	1	14
12	0	0	0	0	10
13	0	0	0	0	15
14	0	0	0	0	14
15	0	0	0	0	5
16	0	0	0	0	5
17	0	0	0	0	1
18	0	0	0	0	3
19	0	0	0	0	2
20	0	0	0	0	0
21	0	0	0	0	0
22	0	0	0	0	0
23	0	0	0	0	2
24	0	0	0	0	5
25	0	0	0	0	0
26	0	0	0	0	1
27	0	0	0	0	0
28	0	0	0	0	0
29	0	0	0	0	0
30	0	0	0	0	1
31	0	0	0	0	9
32	0	0	0	0	1
33	0	0	0	0	0
34	0	0	0	0	1
35	0	0	0	0	0
36	0	0	0	0	0
37	0	0	0	0	1
38	0	0	0	0	1
39	0	0	0	0	1
40	0	0	0	0	0
41	0	0	0	0	1
42	0	0	0	0	1
43	0	0	0	0	0
44	0	0	0	0	0
45	0	0	0	0	0
46	0	0	0	0	0
47	0	0	0	0	1
48	0	0	0	0	1
49	0	0	0	0	0
50	0	0	0	0	0
51	0	0	0	0	0
52	0	0	0	0	1
53	0	0	0	0	0
54	0	0	0	0	0
55	0	0	0	0	0
56	0	0	0	0	1
57	0	0	0	0	0
58	0	0	0	0	0
59	0	0	0	0	0
60	0	0	0	0	0
61	0	0	0	0	0
62	0	0	0	0	0
63	0	0	0	0	0
64	0	0	0	0	0
65	0	0	0	0	0
66	0	0	0	0	0
67	0	0	0	0	0
68	0	0	0	0	1
69	0	0	0	0	0
70	0	0	0	0	0

RESPONSE OF POSTAL SERVICE WITNESS LOETSCHER TO
INTERROGATORY OF DAVID POPKIN

DBP/USPS-T3-6. In the six tables, you show 70-pound parcels that have a volume of between 0.1 and 0.2 cubic feet. This would provide a density of over 345 pounds per cubic foot. Did your study contain records which indicate parcels which did not likely exist such as this example? If so, please explain why these records were not removed. If not, please explain.

RESPONSE:

In the study, the highest density parcel observed had a density of 173 pounds per cubic foot.

The positive values for the proportion of 70 pound parcels between 0.1 and 0.2 are generated by using the regression results to derive the underlying distributions. Only two out of 10,000 70 pound pieces are estimated to be between 0.1 and 0.2 cubic feet. Had we observed parcels with a density of 345 pounds per cubic foot it is unlikely that we would have removed these from the sample since many common substances have a density that exceeds 345 pounds per cubic foot such as brass (534 pounds per cubic foot), iron (478 pounds per cubic foot) and carbon steel (488 pounds per cubic foot) (Source: www.mcelwee.net/html/densities_of_various_materials.html).

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.

Kenneth N. Hollies

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July 8, 2004