

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 INTERROGATORY OF
DAVID B. POPKIN, REDIRECTED FROM WITNESS SCHERER
(DBP/USPS-T1-14(b))
(July 28, 2004)

The United States Postal Service hereby files witness Loetscher's responses to interrogatories of David Popkin: DBP/USPS-T1-14(b), filed on July 13, 2004, and redirected from witness Scherer.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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OF DAVID B. POPKIN

DBP/USPS-T1-14. You indicate that the sampling study was conducted from October 2002 to January 2003.

* * *

[b] Please advise the effect on the study by conducting it at this time of the year.

RESPONSE:

Priority Mail volume is highest during this period. However the high volume likely does not affect the study's estimates. The estimates are representative of annual Priority Mail pieces if mailpiece characteristics within each pound increment, including the density of the contents and the size and types of packaging material used, do not differ significantly from mailpiece characteristics during other times of the year. I have found no data or studies that even suggest such seasonal variations occur. However, since the only available data come from this study, I cannot state with certainty that the timing of data collection did, or did not, affect the study's estimates.

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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