

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

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-89, 98)
(July 5, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories DFC/USPS-89 and 98, filed on June 20, 2005. Objections were filed to interrogatories DFC/USPS-90-97 and 99 on June 30, 2005. Responses to interrogatories DFC/USPS-86-88 are forthcoming. The Postal Service is responding to interrogatory DFC/USPS-98 despite its lateness as follow-up discovery, and may object to any subsequent follow-up to this response.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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DFC/USPS-89. Please refer to the response to DFC/USPS-69.

- a. For the example provided in DFC/USPS-69, please identify which of the elements of DMCS § 522.1 the newspapers permanently bound with staples do not satisfy.
- b. Please explain why the newspapers in the example in DFC/USPS-69 are not Bound Printed Matter.
- c. Please identify the DMCS section that requires Bound Printed Matter to be “created as” Bound Printed Matter.
- d. Please confirm that the Postal Service shipped copies of the Docket No. R2005-1 request for an opinion and recommended decision as unbound sheets of paper.
- e. If a rate-case participant bound the Postal Service’s request for an opinion and recommended decision described in part (d) with spiral bindings or stitching, would the opinion and recommended decision be eligible for shipment as Bound Printed Matter (assuming it met the weight limits of Bound Printed Matter)? If not, please explain why not and include specific citations to the DMCS.

RESPONSE:

It is not possible to answer your questions in the abstract. Rulings about actual items and their eligibility for mailing are made under the procedures in Domestic Mail Manual 607.2 by local postal officials and/or the Pricing and Classification Service Center in New York, which can review the mailpiece and the circumstances involved in the mailing. This question does not seem to have been ruled on before. It is therefore, unlikely that there have been or would be sufficient volumes of such material to have any effect on matters at issue in the instant docket.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DFC/USPS-98. Please refer to the response to DFC/USPS-14. Please explain what a "bulk enroute scan" is.

RESPONSE:

A "Bulk Enroute" scan is a scan that is collected passively by overhead scanners at USPS Bulk Mail Centers on packages that have Confirmation Services barcodes.