

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  
WITNESS SECKAR TO INTERROGATORY OF  
THE NATIONAL ASSOCIATION OF PRESORT MAILERS  
REDIRECTED FROM WITNESS DANIEL  
(NAPM/USPS-T29-1)

The United States Postal Service hereby provides the response of witness Seckar to the following interrogatory of the National Association of Presort Mailers: NAPM/USPS-T29-1, filed on September 17, 1997, and redirected from witness Daniel.


The 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



Kenneth N. Hollies

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October 1, 1997

RESPONSE OF POSTAL SERVICE WITNESS SECKAR TO INTERROGATORIES OF  
NATIONAL ASSOCIATION OF PRESORT MAILERS (NAPM) REDIRECTED FROM  
WITNESS DANIEL

**NAPM/USPS-T29-1.** Please refer to your testimony at Exhibit USPS-29C, page 1 of 6, where you set forth first-class unit cost estimates for, inter alia, single piece flats, presort flats, automated basic flats and automated 3/5-Digit flats. Please provide first class unit cost estimates for automated flats if the makeup requirements were the same as those required of first-class letters (i.e., what would the mail processing and delivery first-class unit cost estimates be for automated 3-Digit flats an for automated 5-Digit flats?)

**RESPONSE:**

Mail processing costs for First-Class automation flats under the automation letter makeup requirements can not be developed at this point in time. The makeup requirements for letters prohibit the use of bundles for automation letters. Such a change in the makeup requirements of automation flats would have a large impact on the mail entry compositions (see page 9 of LR-H-134, Section 1), which are used to generate piece distribution costs. Specifically, the piece distribution costs would increase as a result of the decreased depth of sort. The decreased depth of sort results from requiring an entire tray (or half-tray) to be presorted to a particular level rather than only a bundle of mail presorted to that particular level. There currently is no information available that would allow for gauging the impact of eliminating automation flats bundles on the mail entry compositions.

The elimination of automation bundles in First-Class flats would also affect the costs generated by the bundle sorting and opening unit model presented in Section 6 of LR-H-134. These costs would decrease because there would be no automation bundles to sort. However, the opening unit costs would remain. There currently is no

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information available that would allow for the separation of the bundle sorting costs  
from the opening unit costs.

## DECLARATION

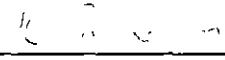
I, Paul G. Seckar, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Paul G. Seckar

Date:

### 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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