DOCKET SECTION

POSTAL RATES COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97:41ssion office of the secretary

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS MOELLER
(NAA/USPS-T36-47)

The United States Postal Service hereby provides the response to the following interrogatory of the Newspaper Association of America: NAA/USPS-T36-47, filed on September 17, 1997, and redirected from witness Moeller.

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

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2997; Fax –5402 October 1, 1997

UNITED STATES POSTAL SERVICE RESPONSE TO INTERROGATORIES OF NEWSPAPER ASSOCIATION OF AMERICA REDIRECTED FROM WITNESS MOELLER

NAA/USPS-T36-47. Please refer to the Postal Service response to NAA/USPS-T36-27(e). Please provide all data and analyses which quantify the likelihood of error in the process of recording the weight when the IOCS tally is recorded.

RESPONSE:

There are no data regarding the likelihood of error in the process of recording the weight of pieces when the IOCS tally is recorded. Although it does not measure the likelihood of error in the recording of weight, there was an attempt made to match FY 1994 IOCS data for second class regular rate mail with the weight recorded on mailing statements for the same publication. There were a number of limitations to this attempt, including: uncertainty regarding the ability to match the publication listed on the tally with the correct issue of the publication; uncertainty regarding the ability to match the tally with a particular edition of an issue (an issue may have several editions of varying weight); the possibility that a mailpiece contains several copies of the publication, in which case the tally would record the weight of the package, but the mailing statement would record the weight of a single copy; and, the weight on a mailing statement for a publication using Centralized Postage Payment will be the average weight of all the editions of the issue. So, to the extent the tally and the mailing statement do not match, it does not necessarily mean that either weight measurement was incorrect, it simply means that the two weight recordings did not match. Despite these and other limitations on the ability to match the tallies with the mailing statements, 67 percent of the dollar weighted tallies did match the weight increment of the mailing statement, 9 percent were in a weight increment between 1-2 ounces different than the weight increment of the mailing statement, 6 percent were between 2-3 ounces different, 4

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percent were between 3-4 ounces different, 3 percent were between 4-5 ounces different, 2 percent were between 5-6 ounces different, 2 percent were between 6-7 ounces different, 2 percent were between 7-8 ounces different and 5 percent were greater than 8 ounces different. It should be noted that Periodicals mail has a much different distribution of mail volume by weight increment than Standard Mail (A) and is not limited to a 16 ounce maximum weight, so these figures may not be representative of Standard Mail (A).

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.

Anthony F. Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 October 1, 1997