

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 MODEN TO INTERROGATORIES OF  
THE NATIONAL ASSOCIATION OF PRESORT MAILERS  
(NAPM/USPS-T4-1-2)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of the National Association of Presort Mailers: NAPM/USPS-T4-1-2, filed on September 17, 1997.

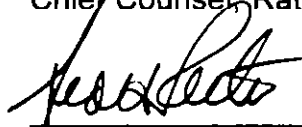
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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Scott L. Reiter

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October 1, 1997

RESPONSE OF POSTAL SERVICE WITNESS MODEN TO  
INTERROGATORIES OF NATIONAL ASSOCIATION OF PRESORT MAILERS

**NAPM/USPS-T4-1:** At page 10 of your testimony you set forth the percentage of all non-carrier route flats which were barcoded in Fiscal Year 1995, Fiscal Year 1996 and through AP9 Fiscal Year 1997. Please break out these percentages by First-Class flats and Standard Flats.

**Response:**

See response to MPA/USPS-T4-5.

RESPONSE OF POSTAL SERVICE WITNESS MODEN TO  
INTERROGATORIES OF NATIONAL ASSOCIATION OF PRESORT MAILERS

**NAPM/USPS-T4-2:** Please confirm that the USPS does want to increase the percentage of First-Class flats which are delivered to the USPS with a barcode. If you do not so confirm, reconcile your answer with the testimony of USPS witness Daniel, who at Exhibit USPS-29C, page 1 of 6, estimated first-class unit costs of automated 3/5 digit flats at 17.8857cents as compared to single piece flats at 40.9560 cents.

**Response:**

Confirmed.

**DECLARATION**

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J Moden

Dated: 10/1/97

## 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.

  
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Scott L. Reiter

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