

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 MAYES TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T37-74)

The United States Postal Service hereby provides responses of witness Mayes to the following interrogatory of United Parcel Service: UPS/USPS-T37-74, filed on September 16, 1997. Interrogatory UPS/USPS-T37-73 was redirected to the Postal Service.

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



Scott L. Reiter

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September 30, 1997

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T37-74. Please refer to your workpapers, WP I.A., at page 1 of 23. Please describe the category "Intra-BMC Non-Alaska Bypass," and explain how this mail is different from "Intra-BMC Alaska Bypass" mail in terms of processing, transportation, etc.

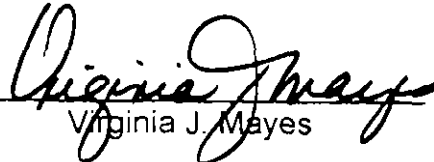
Response:

"Intra-BMC Non-Alaska Bypass" refers to all intra-BMC Parcel Post that is not Alaska Bypass mail and is not paid for through OMAS. The intra-BMC Parcel Post that is not Alaska Bypass mail is processed generally through the BMC system as described in the models of witnesses Crum (USPS-T-28) and Daniel (USPS-T-29), and transported as described in the testimony of witness Hatfield (USPS-T-16). This mail may be entered in bulk or as single pieces, at local post offices, SCFs or the BMC, as part of a plant-verified dropship program or as plant-load mail.

Alaska Bypass mail is called "Bypass" mail because it generally bypasses all postal processing facilities. Postal Service witness Rogerson provided a description of Alaska Bypass mail in Docket No. R90-1. Please refer to the transcript of Docket No. R90-1 at Volume 5, pages 1262-1263, and pages 1675-1682. In addition, in the same docket, PSA witness Bunn discussed Alaska Bypass mail in his rebuttal testimony at pages 14 through 17.

DECLARATION

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


Virginia J. Mayes

Dated: 9-30-97

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.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", written in black ink.

Scott L. Reiter

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