

DOCKET SECTION

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

RECEIVED

OCT 29 4 35 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE NATIONAL NEWSPAPER ASSOCIATION
REDIRECTED FROM WITNESS SECKAR
(NNA/USPS-T26-1-7)

The United States Postal Service hereby provides responses to the following interrogatories of the National Newspaper Association: NNA/USPS-T26-1-7, filed on September 17, 1997, and redirected from witness Seckar. Although filed on September 17, 1997, these interrogatories were not received by the Postal Service until received via fax on October 6, 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


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
October 29, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-1.

Please confirm that DMM section 230.6.4 requires a periodicals mailer, in order to receive the high density rate, to supply at least 125 walk-sequenced addressed pieces for each carrier route or in instances where there are 124 or fewer deliverable addresses to supply 125 pieces anyway or a walk-sequenced address piece for each address.

RESPONSE:

Confirmed that DMM § E230.6.4b states that at least 125 walk-sequenced addressed pieces must be prepared for each carrier route receiving mail claimed at the high density rate, but that mail for carrier routes of 124 or fewer possible deliveries can qualify for the high density rate if there are at least 125 addressed pieces for the route, or if a piece is addressed to every possible delivery on the route. Mail for carrier routes of 124 or fewer possible deliveries may also qualify for the saturation rate under DMM §§ E230.6.4c and E230.6.4d, if a piece is addressed to every possible delivery on the route.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-2.

Please consider the following circumstances:

- Weekly newspaper A covering a city zone claims subscribers--or 127 pieces--equaling 30% of Carrier Route A, a city route with 425 deliverable stops: and
- Weekly newspaper B covering a rural route claims subscribers--or 120 pieces--equaling 60% of Carrier Route B, a rural route with 200 deliverable stops.

Please confirm that weekly newspaper A with a lower penetration of readership in its market would receive the lower "high density" postal rate than weekly newspaper B, assuming the mail is properly prepared under DMM requirements.

RESPONSE:

Confirmed.

RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF NNA
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-3.

Please provide the average number of stops on city carrier routes and the average number of stops on rural routes.

Response:

City - 327

Rural - 369

RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF NNA
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-4.

Please provide an estimate of the number of stops on the smallest rural route in the system.

Response:

The fewest number of stops on a rural route is 1.

RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF NNA
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-5.

Is the Postal Service considering any change in its density requirements for mailers serving rural routes?

Response:

Since "mailers" don't "serve" rural routes, this question is difficult to answer.

Assuming this question refers to the distinction between "L" routes and other rural routes, the Postal Service is not considering altering the density requirement for "L" route status at this time. If the question refers to mailing requirements, the Postal Service similarly is not contemplating any changes at this time.

RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF NNA
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-6.

Please provide copies of any studies performed by the Postal Service updating the work by witness Buc in R90-1 on cost savings in high density mailings.

Response:

Since R90-1, the cost savings for high density mail have been addressed in the testimonies of Peter Hume in Docket No. MC95-1 (USPS-T-7), and Docket No. MC96-2 (USPS-T-2). In the current docket, the cost savings for high density mail are addressed in Mr. Hume's testimony (USPS-T-18) and in LR-H-109. In addition, witness Daniel summarizes the costs associated with Standard A high density mail in exhibit USPS-T-29C.

RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF NNA
REDIRECTED FROM WITNESS SECKAR

NNA/USPS-T26-7.

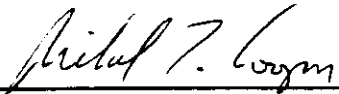
If there have been no studies since witness Buc's work, please confirm that the Postal Service relies upon that study as the basis for the requirements for high density mail. If you cannot confirm, please explain.

Response:

N/A. See the response to question NNA/USPS-T26-6 for a listing of studies.

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.



Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
October 29, 1997