

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

Docket No. R97-1

**INTERROGATORY OF
ALLIANCE OF NONPROFIT MAILERS
TO USPS DESIGNATED POTENTIAL WITNESS MARC SMITH
OR TO THE USPS
(ANM/USPS-SMITH -1)
November 7, 1997**

The Alliance of Nonprofit Mailer hereby submits the following interrogatory:

ANM/USPS-SMITH -1. Please refer to the errata to Library Reference LR-H-111, filed October 28, 1997 that adds references to USPS LR-H-195 at pages 4, 14 and 15, and also at Appendix A, Table 1; Appendix C, Tables 5-7; Appendix C, Table 8; and Appendix E, Table 1, 2, 3 and 8.

- a. For the reference to LR-H-195 at page 4, please indicate precisely by page, line, and column, or cell, where the “[e]stimates for the percentage of mail dropshipped to origin and destination facilities (Y^{origin} , Y^{DBMC} , and Y^{DSCF})” can be found in LR-H-195.

- b. If each datum referenced in preceding part a does not appear in LR-H-195, but must be computed from other data on nonprofit mail presented there, please indicate all data and computations necessary to derive (Y^{origin} , Y^{DBMC} , and Y^{DSCF}) for nonprofit Standard A Mail and exactly which data was used and the precise source of the data by document, page, line, and column.
- c. Please provide a precise reference to the document, page, line and column where all nonprofit entry point profile data used in LR-H-111 and referred to in LR-H-195 at page 14 came from.
- d. Please provide a precise reference by line, and column for all nonprofit pieces per container data used in LR-H-111 and referenced as being from LR-H-195 at page 15.
- e. Please refer to the reference to LR-H-195 in Appendix A, Table 1, and indicate precisely where the nonprofit ODU data referred to in footnote 1 are located in LR-H-195 by page, line, and column
- f. In Appendix C, Table 5, please provide a precise reference by page, line, and column to all data in LR-H-195 that are associated with, or were used to compute, the costs per pound shown in Table 5. If the nonprofit data in LR-H-195 are not identical to the data in Table 5, please indicate precisely by page, line and column all nonprofit data from LR-H-195 that were used, provide the formulas in which they were used, and show how they were used to derive the data that appear in Table 5.

- g. In Appendix C, Table 8, please provide a precise reference to the page, line, and column to all data in LR-H-195 that are associated with, or were used to compute, the array of data shown in Table 8. If the nonprofit data in LR-H-195 are not identical to the data in Table 8, please indicate precisely all nonprofit data from LR-H-195 that were used, provide the formulas in which they were used, and show how they were used to derive any data in Table 8 that were derived from data in LR-H-195.
- h. In Appendix E, Tables 1, 2, and 3, please provide a precise reference to the page, line and column where all data in LR-H-195 that were used to compute the input percentages for sack, tray and pallet models shown in those three tables are presented. If the nonprofit data in LR-H-195 are not identical to the data in Tables 1, 2 and 3, please indicate precisely all nonprofit data from LR-H-195 that were used, provide the formulas in which they were used, and show how they were used to derive the data that appear in those three tables.
- i. In Appendix E, Table 8, please provide a precise reference by page, line and column to the nonprofit pieces per sack, tray and pallet in LR-H-195 that appear in Table 8. If the data in LR-H-195 do not correspond to the figures shown in Table 8 (indicated by footnote 7), please indicate precisely all nonprofit data from LR-H-195 that were used, provide the formulas in

which they were used, and show how they were used to derive the pieces per sack, tray and pallet data that appear in Table 8.

Respectfully submitted,



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November 7, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



November 7, 1997