

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS L. PAUL
LOETSCHER TO INTERROGATORY OF THE ASSOCIATION FOR POSTAL
COMMERCE AND THE MAILING AND FULFILLMENT SERVICE ASSOCIATION
(POSTCOM/USPS-T28-1) (July 28, 2006)

The United States Postal Service hereby provides the response of witness L.
Paul Loetscher to the following interrogatory of the Association for Postal Commerce
and the Mailing and Fulfillment Service Association, filed on July 14, 2006:

POSTCOM/USPS-T28-1

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(USPS-T-28) TO INTERROGATORY OF THE ASSOCIATION FOR POSTAL
COMMERCE AND THE MAILING AND FULFILLMENT SERVICE ASSOCIATION

POSTCOM/USPS-T28-1. Please refer to USPS-LR-L-33 at 13 where you state “the hybrid distribution is produced by controlling the ... distribution of UFSM1000 flats by presort rate to the entry profile or profiles of parcels.”

a. In developing your hybrid distribution, did you assume that the presort rules for Standard Mail hybrid flats are likely to be the same as the current presort requirements for Standard Mail UFSM1000 flats? If not, please explain in detail your assumptions regarding the presort requirements that will apply to hybrid flats.

b. In developing your hybrid distribution, did you assume that the presort requirements for Standard Mail hybrid parcels are likely to be the same as the current presort rules for Standard Mail UFSM1000 flats? If not, please explain in detail your assumptions regarding the presort requirements that will apply to hybrid parcels.

c. Please confirm that the distribution estimates set forth in your library references project that the majority of Standard Mail NFM's are “hybrid parcels.” If not confirmed, please explain your answer fully.

RESPONSE

a-b. In the development of the hybrid distribution in USPS-LR-L-33 no explicit assumptions were made concerning the presort requirements for hybrid parcels or hybrid flats. In the development of the hybrid distributions the two assumptions made were the use of the FY 2005 entry discount distribution of Standard parcels for the entry discount distribution of hybrid pieces and the use of the presort distribution of Standard UFSM 1000 flats from USPS-LR-L-92 for the presort distribution of hybrid pieces.

c. Confirmed.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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