

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS  
THOMAS HARAUSH TO INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
PSA/USPS-T4-1(a), 1(c)

The United States Postal Service hereby provides the responses of witness Thomas Harahush to the following interrogatories of the Parcels Shippers Association: PSA/USPS-T4-1(a), 1(c), filed on July 14, 2006. Interrogatory PSA/USPS-T4-1(b) was redirected to witness Marc Smith for response.

Each interrogatory is stated verbatim and followed by the response:

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 28, 2006

RESPONSE OF POSTAL SERVICE WITNESS THOMAS W. HARAUSH TO  
INTERROGATORY POSED BY PARCEL SHIPPERS ASSOCIATION

**PSA/USPS-T4-1.** Please refer to your response to POIR No. 5, Question 16 which states, "There are other instances where Periodicals may show as flats on mailing statements and parcels in the data systems. For example, if a large but less than  $\frac{3}{4}$  inch flat is rolled prior to its receipt by the carrier so the carrier can handle the mailpiece easily and efficiently, the flat would be counted as a parcel in the carrier systems because it is thicker than  $\frac{3}{4}$  inch. Furthermore, if a Periodical flat is on the top of a direct bundle given to a rural carrier, the data collector will record the bundle as a Periodical parcel, using the top-piece rule. Similarly in RCCS, rigid flats (including properly prepared "do not bend" mailpieces) that exceed five inches in height are recorded in the Parcel Compensation Category as well as other mailpieces that cannot fit in the case with other mail. In the CCCS, if a large Periodical flat is in the parcel hamper, a data collector will record that piece as a parcel when the carrier is using a two case system."

- (a) Please discuss all instances where Standard Mail pieces that are less than  $\frac{3}{4}$  inch thick "may show as flats on mailing statements and parcels in the data systems."
- (b) Does the Postal Service's method of transferring Standard Regular costs from parcels to flats account for the fact that some Standard Mail pieces that are less than  $\frac{3}{4}$  inch thick "may show as flats on mailing statements and parcels in the data systems." If so, please explain fully.
- (c) Please discuss all instances where First-Class Mail pieces could be counted as flats by RPW and as parcels in the data systems.

**RESPONSE:**

- (a) In the CCCS, if a standard mailpiece that is less than  $\frac{3}{4}$  inch is in the parcel hamper, a data collector will record that piece as a parcel when the carrier is using a two case system. Additionally, if a mailpiece is less than  $\frac{3}{4}$  inch in thickness and longer than 15 inches but less than or equal to 15  $\frac{3}{4}$  inches in length, the mailpiece could be classified as a flat on the mailing statements but as a parcel in CCCS.

In RCCS, if a standard mailpiece is on the top of a direct bundle given to a rural carrier, the data collector will record the bundle in the standard parcel or direct bundle compensation category, using the top-piece rule.

Similarly in RCCS, rigid flats (including properly prepared "do not bend" mailpieces) that exceed five inches in height are recorded in the Parcel Compensation Category as well as other mailpieces that cannot fit in the case separation with other mail.

RESPONSE OF POSTAL SERVICE WITNESS THOMAS W. HARAUSH TO  
INTERROGATORY POSED BY PARCEL SHIPPERS ASSOCIATION

In IOCS, I am told that if a mailpiece is less than  $\frac{3}{4}$  inch in thickness and longer than 15 inches but less than or equal to  $15\frac{3}{4}$  inches in length, the mailpiece could be classified as a flat on the mailing statements but as a parcel in IOCS.

TRACS does not collect data on shape, so the issue does not arise.

(b) [Redirected to Witness Smith, USPS-T-13.]

(c) In the CCCS, if a First-Class mailpiece that is less than  $\frac{3}{4}$  inch is in the parcel hamper, a data collector will record that piece as a parcel when the carrier is using a two case system. Additionally, if a presort mailpiece that satisfies DMM 301.3.4.2 is  $\frac{3}{4}$  inch to  $1\frac{1}{4}$  inch thick or is 15 inches to  $15\frac{3}{4}$  inches long, the mailpiece could be classified as a flat by RPW and as a parcel in CCCS.

In RCCS, if a First-Class mailpiece is on the top of a direct bundle given to a rural carrier, the data collector will record the bundle in the First-Class parcel or direct bundle compensation category, using the top-piece rule. Similarly in RCCS, rigid flats (including properly prepared "do not bend" mailpieces) that exceed five inches in height are recorded in the Parcel Compensation Category as well as other mailpieces that cannot fit in the case separation with other mail.

In IOCS, I am told that if a presort mailpiece that satisfies DMM 301.3.4.2 is  $\frac{3}{4}$  inch to  $1\frac{1}{4}$  inch thick or is 15 inches to  $15\frac{3}{4}$  inches long, the mailpiece could be classified as a flat by RPW and as a parcel in IOCS.

TRACS does not collect data on shape, so the issue does not apply.