

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-89 & 91)

The United States Postal Service hereby provides responses to the following interrogatories of David B. Popkin: DBP/USPS-89 & 91.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
November 17, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-89. Please clarify your response to DBP/USPS-79, [a] does all automated ("automated" is underlined) mail currently receive processing through equipment which will "trap" a Certified Mail article? [b] If not, provide the plan of implementation for installing such equipment at the facilities where it does not exist.

RESPONSE:

- a. No. While most of the automated letter mail is processed on a DBCS or CSBCS, there is some automated letter mail that does not receive processing on this equipment. For instance, mail prepared in a 5-digit tray to a small office (with fewer than five carriers) is worked manually by the clerks in that office. Therefore, as mentioned in DBP/USPS-79(a), the certified mail piece is trapped by the clerk during the distribution process.
- b. The implementation plan for CSBCSs and DBCSs was discussed at page 7 in witness Moden's testimony. In addition, portions of the overall deployment schedules for these machines were provided in Library Reference H-244.

U.S. POSTAL SERVICE RESPONSE TO INTERROGATORIES OF
DAVID B. POPKIN

DBP/USPS-91. In your response to DBP/USPS-81 subpart b, your response does not provide the logic for charging more for a package which weighs less than another similar package. Assume that the mailer is not interested in obtaining the better service that Priority Mail would provide. Please respond to the original subpart.

RESPONSE:

The "logic" for the higher rate for the 15-ounce piece is the better service it will receive as a Priority Mail piece. The pieces are not "similar" in that, regardless of whether "the mailer is interested in obtaining the better service that Priority Mail" provides, the lighter weight piece will be handled as a Priority Mail piece.

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 black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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