

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF NASHUA PHOTO INC., ET AL.
REDIRECTED FROM WITNESS CRUM (NDMS/USPS-T28-20(A))
AND WITNESS SHARKEY (NDMS/USPS-T33-31)

The United States Postal Service hereby provides the response of witness Moden to the following interrogatories of Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc., filed on September 17, 1997: NDMS/USPS-T28-20(a), redirected from witness Crum; and NDMS/USPS-T33-31, redirected from witness Sharkey.

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

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September 29, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.
REDIRECTED FROM WITNESS CRUM

NDMS/USPS-T28-20(a). Please describe in qualitative terms all critical respects in which manual processing of flats differs from manual processing of parcels.

Response:

Manual distribution of flats is accomplished by casing mail in flats distribution cases. Flats to be distributed are loaded (stacked) and faced (i.e., with address side facing up) on a ledge in front of the case. The clerk performing manual distribution of flats holds a quantity of flats to be distributed in one hand or crook of one arm and distributes individual flats with the other. Distribution can be made with relatively little movement required because of the layout/configuration of the case. Manual distribution of parcels is generally accomplished by throwing/tossing parcels into sacks or other containers. Generally, parcels to be distributed manually are dumped onto a conveyor belt or into a container from which individuals distributing them must pick each parcel up one at a time, and orient the piece so that the address is readable. The employee then tosses the parcel into one of the containers as noted above. Other pieces require placement in the proper container which generally requires the sorter to carry the parcel to the container.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
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REDIRECTED FROM WITNESS SHARKEY

NDMS/USPS-T33-31.

The current rate for an 11 ounce piece of First Class Mail is \$2.62, and the minimum rate for Priority Mail is \$3.00. As a hypothetical, suppose that someone deposited in a collection box an 11.5 ounce package with postage affixed of \$2.85 (\$2.62 plus an additional 23 cents), and the contents were in an envelope with a preprinted inscription "First-Class Mail."

- e. *Would the Postal Service return it to sender for an additional 15 cents postage so that it could go as Priority Mail?*
- f. *Would the Postal Service handle it as Priority Mail and attempt to collect 15 cents postage due from the addressee?*
- g. *Would the Postal Service handle it as First-Class Mail and attempt to collect 15 cents postage due from the addressee?*
- h. *Would the Postal Service handle it as First-Class Mail and deliver it without any attempt to collect postage due?*

Response:

The above interrogatories were originally labeled as letters e-h. They have been revised in this section to a-d respectively.

- a. No.
- b. No, the piece would receive First Class service since the inscription on the piece bears "First Class Mail" and the proper Priority Mail postage was not paid.
- c. No. The proper First Class postage has been paid.
- d. Yes.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/29/97

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", is written over a horizontal line.

Scott L. Reiter

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