

# 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

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS DANIEL TO INTERROGATORY OF  
THE ADVERTISING MAIL MARKETING ASSOCIATION  
REDIRECTED FROM THE POSTAL SERVICE  
(AMMA/USPS-USPS-1)

The United States Postal Service hereby provides the revised response of witness Daniel to the following interrogatory of the Advertising Mail Marketing Association: AMMA/USPS-USPS-1, filed on November 14, 1997, and redirected from the Postal Service. The only change to the original response, filed November 21, 1997, is to correct the page numbers on the last line of the response from "4, 6, and 8" to "6, 8, and 10".

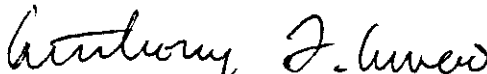
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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December 2, 1997

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO INTERROGATORY OF ADVERTISING MAIL MARKETING ASSOCIATION

Revised 12/2/97

**AMMA/USPS-USPS-1** The response to AMMA/USPS-LR-H-103-3a, states, "There are no results from LR-H-105 used directly or indirectly in USPS-T-29 Appendix I pages 5, 7, or 9." However, LR-H-105 is referenced by Witness Daniel as the source of the mail entry profile (USPS-T-29: page 3 line 23; Appendix I pages 36 and 37). If LR-H-105 is not the source of the "Mix of Handlings" (column [1] of pages 5, 7 and 9 of USPS-T-29 Appendix I) please provide the source of the "Mix of Handlings" including page, line, and column locations and any required derivations.

### RESPONSE:

Pages 5, 7 and 9 of Appendix I are cost summaries of Standard (A) Automation 5-Digit, Automation 5-Digit 100% DBCS, and Automation ECR letter mail flows. Because of the high degree of worksharing involved, the mail flows for these mail streams are simple. As a consequence, mail characteristics data are not needed to determine the mailflows for these types of mail. Below, I demonstrate why the initial mix of handlings of each of the three categories on pages 5, 7, and 9 is self-evident.

- *Automation 5-Digit.* Because Automation 5-Digit letters are by definition barcoded and presorted to the 5-Digit level in full trays, they will be processed in an incoming secondary operation either on barcode sorters or manually. As stated on page 4 of USPS-T-29, "[t]he number of pieces entered on automation equipment, i.e., the BCS and OCR, is then usually adjusted by subclass-specific coverage factors<sup>1</sup> (USPS LR-H-128) to reflect the fact that not all sites have automation equipment."
- *Automation 5-Digit 100% DBCS.* Automation 5-Digit 100% DBCS by definition will be processed in an incoming secondary operation on DBCSs and no coverage factors are needed to determine where the mail is entered.
- *Automation ECR.* Automation ECR letters begin processing on CSBCSs or manually based on coverage factors.

The sources of the mix of handlings in the first column appearing on pages 5, 7, and 9 of Appendix I consists of the figures presented in the boxes of the corresponding operation in the mail flow diagrams on pages 6, 8, and 10 of Appendix I.

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<sup>1</sup> Coverage factors used are found in Appendix I, pages 38 and 39.

# DECLARATION

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

Sharon Daniel

Dated: December 2, 1997

## 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.

David H. Rubin for  
Anthony F. Alverno

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