

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE AND FEE CHANGES
OFFICE OF THE SECRETARY
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE ALLIANCE OF NONPROFIT MAILERS (ANM/USPS-27)

The United States Postal Service hereby provides the response to the following interrogatory of the Alliance of Nonprofit Mailers: ANM/USPS-27, filed on December 22, 1997.

The Postal Service notes that the question posed in this interrogatory relates to the library references incorporated by reference in witness Talmo's testimony, USPS-ST-50, upon which written discovery is no longer permitted. The Postal Service accordingly objects to this interrogatory on grounds that it is untimely filed. Notwithstanding, in the interest of cooperation, the Postal Service has undertaken to provide a response; however, by filing this response, the Postal Service does not intend to waive its right to object to further cross-examination related to the subject matter in these responses or to any other discovery request.

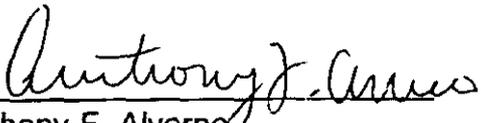
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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January 5, 1998

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS**

ANM/USPS-27 Please provide a tabulation of the standards which were not met by Nonautomation presort letters in containers labeled "NON_OCR" that were not upgradable in the Standard (A) Mail Characteristic Study (LR-H-105) and in the Standard (A) Nonprofit Mail Characteristics Study (LR-H-195). (Note: At the technical conference on November 28, the ANM was informed that standards not met by such mail were recorded, but had not been tabulated. The ANM has since attempted to tabulate this data, but discovered it requires the utilization of the UNIX operating system which the ANM does not have reasonable access to. In short, it is the ANM's understanding that the data sought was recorded in accordance with the questionnaires used in the Studies. All the ANM is requesting is a report that tabulates this data.)

RESPONSE:

The data concerning conditions not met for upgradability are contained in the machine readable files in LR-H-105 and LR-H-195. These files are in a standard ASCII format and do not require any specific operating system to be read. Nonetheless, tabulations of these data are reported here, in Attachments A and B. Note that the results are not weighted for the relative size of each transaction within a stratum nor weighted for the relative sizes of the strata. The sum of the counts for each condition is greater than the number of relevant survey observations since multiple conditions were sometimes indicated.

Attachment A

**Standard Mail (A) Regular Rate Mail Characteristics Study (LR-H-105)
Summary of Reasons for Nonautomation Presort Letters Failing
Upgradability Standards in Containers Labeled "Non-OCR"**

Survey Summary

Total Surveys Collected in Study	1118
Surveys with Nonautomation Presort Letters in Trays Labeled "Non-OCR"	218
Such Surveys with Letters Passing Upgradability Standards	86
Such Surveys with Letters Failing Upgradability Standards	132

Unweighted Tabulation of Reasons For Failing Upgradability Standards

<u>Reason</u>	<u>Count</u>
LENGTH	2
HEIGHT	2
THICKNESS	3
WEIGHT	0
PROPERLY SEALED/TABBED	49
ASPECT RATIO	3
OCR READ AREA	90
FONT	0
BARCODE CLEAR ZONE	42
ADDRESS WINDOW/INSERT	12
NON-GLOSSY PAPER	4
OTHER	5
NO REASON INDICATED	2

Attachment B

**Standard Mail (A) Nonprofit Rate Mail Characteristics Study (LR-H-195)
Summary of Reasons for Nonautomation Presort Letters Failing
Upgradability Standards in Containers Labeled "Non-OCR"**

Survey Summary

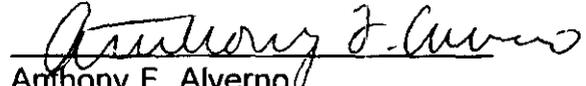
Total Surveys Collected in Study	1099
Surveys with Nonautomation Presort Letters in Trays Labeled "Non-OCR"	643
Such Surveys with Letters Passing Upgradability Standards	203
Such Surveys with Letters Failing Upgradability Standards	440

Unweighted Tabulation of Reasons For Failing Upgradability Standards

<u>Reason</u>	<u>Count</u>
LENGTH	4
HEIGHT	6
THICKNESS	9
WEIGHT	2
PROPERLY SEALED/TABBED	243
ASPECT RATIO	6
OCR READ AREA	280
FONT	14
BARCODE CLEAR ZONE	161
ADDRESS WINDOW/INSERT	15
NON-GLOSSY PAPER	5
OTHER	13
NO REASON INDICATED	9

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.


Anthony F. Alverno

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