

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

**FOLLOW-UP INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE AND THE
MAILING AND FULFILLMENT SERVICE ASSOCIATION
TO USPS WITNESS L. PAUL LOETSCHER**

(POSTCOM/USPS-T28-2-3)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce and the Mailing Fulfillment Service Association (herein, collectively "PostCom") direct the attached Follow-up Interrogatories to Witness L. Paul Loetscher. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T28-2. During cross-examination, you stated that the definitional categories for non-ECR Standard Mail non-letter volumes upon which you based your study were provided by Witness McCrery. (Loetscher Tr. at 1538:10-22). You also stated that you received these definitions from Witness McCrery via e-mail (Loetscher Tr. at 1539:1-2).

- a.** Please provide a copy of the e-mail referenced in your cross-examination in which Witness McCrery conveyed the definitional categories for non-letter volumes to you.
- b.** Please provide copies of any and all e-mail or other correspondence from or to Witness McCrery that addresses or otherwise discusses the definitional categories for non-letter volumes, including but not limited to any iterations of the definitional categories.
- c.** Please provide copies of any and all correspondence from any Postal Service employee that addresses or otherwise discusses the definitional categories for non-letter volumes, including but not limited to any iterations of the definitional categories.
- d.** Please provide copies of any and all additional supporting documentation that addresses the definitional categories for non-letter volumes upon which you relied.

POSTCOM/USPS-T28-3: In USPS-LR-L-33, you state that hybrid flats are “[p]ieces that can be cased but are not AFSM 100 compatible [as defined in DMM 301.3.3]. To be cased, the piece must either have one dimension (length or height) less than or equal to six inches OR the piece must meet BOTH the maximum rigidity requirement and the turning ability requirement. Hybrid flats have dimensions compatible with the UFSM 1000 machines (DMM 301.3.3.4.2), but are

less than or equal to .75 inch in length.” (USPS-LR-L-33 at 4-5). You also state that hybrid parcels are “[p]ieces that are UFSM 1000 compatible (DMM 301.3.4), but can not be cased, and are not AFSM 100 compatible.” (USPS-LR-L-33 at 5).

- a.** Please confirm that these are the definitions upon which you relied for your non-letter volumes study. If not, please provide any alternate definitions upon which you relied for you non-letter volumes study.
- b.** Consider the following examples: (1) a mail piece that is not caseable (*e.g.*, has dimensions greater than six inches), but is less than .75 inches thick; and (2) a mail piece that is caseable but is more than .75 inches thick.
 - 1.** Please confirm that these mail pieces do not meet the definitional requirements for either a hybrid flat or a hybrid parcel. If you do not confirm, please explain your answer in full.
 - 2.** Please describe how these mail pieces were treated for purposes of your study.