

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF  
AMERICAN BANKERS ASSOCIATION &  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
(ABA&NAPM/USPS-T22-11) (ERRATA)

The United States Postal Service hereby provides its revised response to the following interrogatory of American Bankers Association & National Association of Presort Mailers: ABA&NAPM/USPS-T22-11. The original response was filed on November 29, 2001. The revised response supersedes the original response.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Michael T. Tidwell

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December 21, 2001

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF AMERICAN BANKERS ASSOCIATION &  
NATIONAL ASSOCIATION OF PRESORT MAILERS

**ABA&NAPM/USPS-T22-11**

**Revised 12/21/01**

- (a) Please confirm that the Postal Service itself has acknowledged that the move update program saved it more than \$1.5 billion in forwarding and return costs in FY 98 alone (see response of United States Postal Service to Interrogatory MMA/USPS-1(j) at Tr. Vol 21 pages 8897 and 8899 in R2000-1.
- (b) Please indicate whether the Postal Service has obtained any updates to the Price Waterhouse 1995 study on First-Class Undeliverable As Addressed ("UAA") mail, or any other studies since 1995, quantifying USPS forwarding and return costs of UAA First-Class Mail, and please produce such studies.
- (c) What are the most recent cost figures which the Postal Service has for the cost per piece of forwarded First-Class UAA Mail and the cost per piece of returned First-Class UAA Mail?
- (d) What percent of First Class Automated Letters is UAA mail? What percent of First Class metered letters is UAA mail?

**RESPONSE:**

- (a) Confirmed.
- (b) Please see USPS LR-I-82 in Docket No. R2000-1.
- (c) Please see USPS LR-I-82 in Docket No. R2000-1.
- (d) The Postal Service does not have data responsive to this request.

## **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.

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Michael T. Tidwell

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