

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
L. PAUL LOETSCHER (USPS-T-28) TO INTERROGATORY OF  
THE PARCEL SHIPPERS ASSOCIATION (PSA/USPS-T28-2)  
(July 28, 2006)

The United States Postal Service hereby provides the response of witness  
Loetscher (USPS-T-28) to the following interrogatory of the Parcel Shippers  
Association, filed on July 14, 2006:

PSA/USPS-T-28-2

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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RESPONSE OF USPS WITNESS LOETSCHER (USPS-T-28) TO  
INTERROGATORY OF THE PARCEL SHIPPERS ASSOCIATION

**PSA/USPS-T28-2.** Please refer to the Survey Instrument provided in USPS-LRL-33 and also to USPS-LR-L-33, Table 4.

- (a) Please define "Parcel" preparation as the term is used in the survey instrument.
- (b) Controlled to FY 2005 RPW values, how many Standard Mail pieces were recorded as both "Parcel" preparation and as being less than 3/4" thick?

**RESPONSE:**

- (a) The preparation field on the survey instrument was included for the sole purpose of aiding data collectors in the length measurement. For boxed, enveloped, single sheet, wrapped and sleeved pieces the length was the measurement of the longest side. For bound and folded pieces the length was the measurement parallel to the final fold. "Parcel" was indicated when the piece was non-letter and non-flat (DMM 101 definitions) or if the piece was "boxed". The presence of a "Parcel" indication in the preparation field only indicates the length was the measurement of the longest side and the piece was not bound or folded. A value of "Parcel" in the preparation field does not indicate the piece was a parcel under any definition. The field was not used for any other purpose or in any subsequent analysis.
- (b) Inflated to RPW, 220,307,088 pieces were recorded as having a preparation of "Parcel" and were less than ¾" thick. As the purpose of the preparation field on the survey instrument was only intended to guide the data collectors in the measurement of length I cannot ascribe any meaning to this number.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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