

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 TO INTERROGATORY OF THE ASSOCIATION FOR POSTAL
COMMERCE AND THE MAILING AND FULFILLMENT SERVICE ASSOCIATION
(POSTCOM/USPS-T28-3) (August 29, 2006)

The United States Postal Service hereby provides the response of witness L.
Paul Loetscher to the following interrogatory of the Association for Postal Commerce
and the Mailing and Fulfillment Service Association, filed on August 15, 2006:

POSTCOM/USPS-T28-3

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(USPS-T-28) TO INTERROGATORY OF THE ASSOCIATION FOR POSTAL
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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 nonletter volumes study. If not, please provide any alternate definitions upon which you relied for your 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.

RESPONSE:

a. Partially confirmed. Pages 4 and 5 of USPS-LR-L-33 provide a general description of hybrid flats and hybrid parcels. A more complete description of the criteria used to define hybrid flats and hybrid parcels is provided in Appendix C of USPS-LR-L-33.

b. Not confirmed. Please refer to Appendix C of USPS-LR-L-33. In USPS-LR-L-33, a piece that cannot be cased is defined as one that fails either maximum rigidity requirement or the turnability requirement and neither the length or height is less

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RESPONSE TO POSTCOM/USPS-T28-3 (continued)

than 6 inches. If a non-caseable piece meets the UFSM 1000 requirements (DMM 301.3.3.4.2 except address placement and folded pieces rule) then the piece will be categorized as a hybrid parcel in USPS-LR-L-33. A piece that can be cased but is greater than 0.75 inches thick is categorized as a hybrid parcel provided it meets the UFSM 1000 requirements in (DMM 301.3.3.4.2 except address placement and folded).

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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