

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MEEHAN TO INTERROGATORY OF
THE NATIONAL NEWSPAPER ASSOCIATION
(NNA/USPS-T11-1)

The United States Postal Service hereby provides the response of witness Meehan to the following interrogatory of the National Newspaper Association: NNA/USPS-T11-1, filed on March 23, 2000. Interrogatories NNA/USPS-T11-2-7, 13, and 15 were redirected to witness Hunter and interrogatories NNA/USPS-T11-8-12, 14 and 16 were redirected to the Postal Service.

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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April 6, 2000

**Response of United States Postal Service Witness Meehan
to
Interrogatories of National Newspaper Association**

For the following questions, please refer to Exhibit USPS-11C of your testimony, which present the Cost and Revenue Analysis for Base Year 1998. For Periodicals In-County mail, this exhibit lists a volume variable cost of \$76.9 million (column C on page 1), a marginal cost of \$0.083 per piece (column E on page 1), and a total volume of 923,965,000 pieces (page 3). If another witness in this case possesses greater expertise on any question, please refer the question to him or her.

NNA/USPS-T11-1 Please confirm that the marginal cost of \$0.083 per piece is obtained by dividing the volume variable cost estimate of \$76.9 million by the 1998 volume estimate of 923,865,000 pieces.

Response:

Confirmed.

DECLARATION

I, Karen Meehan, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Karen B Meehan

4/6/00

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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