

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BANK ONE
CORPORATION

Docket No. MC2004-3

RESPONSE OF UNITED STATES POSTAL SERVICE
TO PRESIDING OFFICER'S INFORMATION REQUEST No. 4
(POIR4)

The United States Postal Service hereby provides responses to Presiding Officer's Information Request (POIR) No. 4. The POIR was issued on August 23, 2004, and requested responses by September 2, 2004.

Each information request is stated verbatim, then followed by its response. The witness attesting to the response is identified in the header thereof.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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September 2, 2004

RESPONSE OF UNITED STATES POSTAL SERVICE MICHAEL PLUNKETT
TO PRESIDING OFFICER'S INFORMATION REQUEST No. 4, QUESTION 1

POIR 4, Q1. Refer to USPS-T-1, Appendix A, page 3. Please provide FY 2003 Billing Determinants separately for First-Class operations letters and First-Class marketing letters for (a) Bank One and (b) J.P. Morgan Chase.

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RESPONSE:

Please see page 3 of the attachment to the Revised Response to the United States Postal Service Witness Plunkett to Interrogatory of the Office of Consumer Advocate (OCA/USPS-T1-44), filed September 1, 2004.

RESPONSE OF UNITED STATES POSTAL SERVICE MICHAEL PLUNKETT
TO PRESIDING OFFICER'S INFORMATION REQUEST No. 4, QUESTION 2

POIR 4, Q2 Refer to USPS-T-1, Appendix A, page 1. While the contingency factor in line 12 appears as 1.03, it is rounded from 1.025. Please explain the rationale for using a contingency factor of 1.025, as opposed to the 1.03 factor used in Docket No. MC2002-2 and R2001-1.

RESPONSE:

Please see the United States Postal Service Notice of Second Errata to the Testimony of Witness K. Plunkett, filed on September 1, 2004, and the attachment thereto.

RESPONSE OF UNITED STATES POSTAL SERVICE MICHAEL PLUNKETT
TO PRESIDING OFFICER'S INFORMATION REQUEST No. 4, QUESTION 3

POIR 4, Q3 Refer to USPS-T-1, Appendix A, page 9. The ECR letter unit costs in lines 14 and 15 (0.080 cents and 0.059 cents, respectively) are derived by applying an inflation adjustment to costs from Docket No. R2001-1 LR-J-58 as originally filed. The Postal Service later revised LR-J-58, changing the cost estimates used to calculate the figures in lines 14 and 15. Please explain the rationale for using the unrevised costs.

RESPONSE:

Please see the United States Postal Service Notice of Second Errata to the Testimony of Witness K. Plunkett, filed on September 1, 2004, and the attachment thereto.

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.

Nan K. McKenzie

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