

DOCKET SECTION

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

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OFFICE OF THE SECRETARY

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Docket No. MC2000-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS POELLNITZ TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T2-1-3)

The United States Postal Service hereby provides the responses of witness Poellnitz to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-1-2, filed on December 17, 1999, and OCA/USPS-T2-3, filed on December 20, 1999. Interrogatory OCA/USPS-T2-4, filed on December 20, 1999, has been redirected to witness Garvey.

Each 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



David H. Rubin

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December 29, 1999

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS POELLNITZ  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-T2-1, p.1 of 1

**OCA/USPS-T2-1.** Please refer to your testimony at pages 7 and 9, footnotes 11 and 18, and the testimony of witness Seckar (USPS-T-2) in Docket No. MC98-1.

- a. Please explain the significance of, and the rationale for, your decision to “make no assumptions about MOL volume allocation between sites.”
- b. Does your decision produce superior results to that of witness Seckar in Docket No. MC98-1? Please explain.

**RESPONSE:**

- a. It is my understanding that witness Seckar assumed an even distribution of MOL volume, and therefore printers and inserters, across sites at the end of the experiment in order to calculate the number of print sites that would be contracted for in the first and second years of the experiment (Docket No. MC98-1, USPS-T-2, p.14). This was necessary, because the print site roll-out schedule had not been determined at the time of witness Seckar’s testimony. I made no assumption about MOL volume distribution between sites, because no such assumption was necessary in light of my awareness of a planned roll-out schedule for the experiment. In addition, I would have no economic basis for applying such an assumption.
- b. As mentioned in “a” above, application of witness Seckar’s methodology was not necessary in my testimony. My cost estimates simply reflect the latest available information and are therefore more appropriate for the MOL experiment being examined in this docket.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS POELLNITZ  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-T2-2, p.1 of 1

**OCA/USPS-T2-2.** Please refer to your testimony and the testimony of witness Seckar (USPS-T-2) in Docket No. MC98-1. Please identify any assumptions or methodological approaches in your testimony that are different from the assumptions made or methodological approaches used by witness Seckar in Docket No. MC98-1 (other than the assumption identified in OCA/USPS-T2-1, above). Please explain the significance of, and your rationale for, any changes identified.

**RESPONSE:**

In general, the assumptions and methodological approaches in my testimony are consistent with those used by witness Seckar in Docket No. MC98-1. Most differences consist of updates to outdated data and incorporation of a print-site roll-out schedule and new print contractor requirements. Significant differences are explained in the relevant sections of my testimony. See, for example, page 13, footnote 31.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS POELLNITZ  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
OCA/USPS-T2-3, p.1 of 1

**OCA/USPS-T2-3.** Please refer to your testimony at page 9, lines 1-7 and footnotes 15. Does this mean that no jobs other than black and white impressions on 11 X 17 paper will have finishing of any type? If no, please explain.

**RESPONSE:**

No. My statements indicate that the only print jobs requiring a Xerox in-line Signature Booklet Maker finisher are those printed on 11x17 paper. The Xerox Docutech 6180 and 92C printers assumed in my testimony have the capability of providing expected finishing requirements for jobs printed on 8.5x11 and 8.5x14 paper.

**DECLARATION**

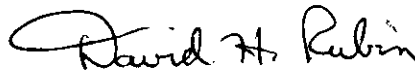
I, Joseph M. Poellnitz, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, reading "Joseph M. Poellnitz", is written over a horizontal line.

Dated: DECEMBER 29, 1999

## 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.

A handwritten signature in cursive script that reads "David H. Rubin". The signature is written in black ink and is positioned above a solid horizontal line.

David H. Rubin

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