

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 INTERROGATORIES OF OF  
DOUGLAS F. CARLSON  
REDIRECTED FROM WITNESS DAVIS  
(DFC/USPS-T30-6 and 7)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of Douglas F. Carlson: DFC/USPS-T30-6 and 7, filed on January 27, 2000, and redirected from witness Davis.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
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February 10, 2000

**Response of United States Postal Service Witness Meehan  
to  
Interrogatories of Douglas F. Carlson  
(Redirected from Witness Davis, USPS-T-30)**

**DFC/USPS-T30-6.** Please provide an analysis of why the costs for certified mail have increased substantially since Docket No. R97-1.

**Response:**

Although we have not identified all possible causes, new or updated studies were introduced in the Base Year 1998 CRA that raised the costs for certified mail. The studies that most impacted certified mail are those for mail processing and carriers. The mail processing studies are described in the following testimonies: USPS-T-15, USPS-T-16 and USPS-T-17. The carrier studies are described in USPS-T-12.

**Response of United States Postal Service Witness Meehan  
to  
Interrogatories of Douglas F. Carlson  
(Redirected from Witness Davis, USPS-T-30)**

**DFC/USPS-T30-7.** Why does the new methodology for estimating costs for certified mail necessarily provide a better estimate of costs than the old methodology?

**Response:**

The reasons for adopting these new methodologies can be found in the testimonies of the witnesses cited above in DFC/USPS-T30-6. Please see USPS-T-12, USPS-T-15, USPS-T-16 and USPS-T-17.

**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 Meehan

Dated: 2/10/00

## 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.



Susan M. Duchek

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