

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

RECEIVED
FEB 10 4 58 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DANIEL TO INTERROGATORIES OF ALLIANCE OF NONPROFIT
MAILERS
(ANM/USPS-T28—1-4)**

The United States Postal Service hereby provides the responses of witness Daniel to the following interrogatories of the Alliance of Nonprofit Mailers: ANM/USPS-T28—1-4, filed on January 27, 2000.


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, Rate-making


Anthony Alverto
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 10, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS**

ANM/USPS-T28-1. Please refer to your testimony at p. 5, footnote 1. With respect to your reference to USPS LR-I-99, please provide the exact page(s) to which you refer, and for each page cited, the line(s) to which you refer.

RESPONSE:

Footnote 1 refers generally to the direct tally data described in Section IV of the text on page 5 of Library Reference USPS LR-I-99. An electronic, soft copy of the data is found in the file entitled "LR99Sec5DIR.xls."

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS**

ANM/USPS-T28-2. Please refer to your testimony at p. 4 [sic], footnote 7 [sic]. With respect to your reference to USPS LR-I-95, please provide the exact page(s) to which you refer, and for each page cited, the line(s) to which you refer.

RESPONSE:

It is assumed that this question intended to cite footnote 4 on page 7. The reference to USPS LR-I-95 is intended to refer to how the delivery costs are reconciled in the carrier route analysis of the development of delivery costs by rate category. The output of the FORTRAN program is reconciled to the base year costs by shape in witness Ramage's workpaper (WP.A.) on page 8 of the Excel file, which is printed on the 11th page of USPS LR-I-95. The reconciliation occurs in column [2] using the data in columns [6] and [7].

The reconciliation of Base Year delivery costs used in weight studies is described in section C.2. of my testimony (Conversion to Reconciled Test Year Piggybacked Costs).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS**

ANM/USPS-T28-3. Please refer to your testimony at p. 18, footnote 8 [sic]. With respect to your reference to USPS LR-I-94, please provide the exact page(s) to which you refer, and for each page cited, the line(s) to which you refer.

RESPONSE:

It is assumed that this question intended to refer to footnote 9 on page 18. The supporting calculations for the adjustments referred to can be found in Section IV of USPS LR-I-94 entitled "Regression of Periodicals Adjusted Unit Costs and Weight Increment." All of the pages in this section are relevant to supporting the calculation of the adjustments.

The names of the electronic files supporting these calculations all begin with "LR94dxxx." These files include the regression input database "LR94dreg.dbf"; the SAS program and its log and list files entitled "LR94dreg.sas, .log, .lst"; and an excel spreadsheet entitled "LR94dper.xls."

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS**

ANM/USPS-T28-4. Please refer to your testimony at p. 18, footnote 8 [sic]. With respect to your reference to USPS LR-I-102, please provide the exact page(s) to which you refer, and for each page cited, the line(s) to which you refer.

RESPONSE:

It is assumed that this question intended to refer to footnote 9 on page 18. The volume data supporting the adjustments referred to in the question can be found on page 32 of USPS LR-I-102, Table 11 entitled "Periodicals Copies by Subclass, Presort Level and Ounce Increment, FY1998." All of the figures in this table are used in the calculations found on pages 1 and 2 of Section IV in USPS LR-I-94.

DECLARATION

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


SHARON DANIEL

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.



Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 10, 2000