

UNITED STATES OF AMERICA  
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

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: CHARLES L. CRUM (OCA/USPS-T27-8-9)  
February 11, 2000

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN  
Director  
Office of the Consumer Advocate

EMMETT RAND COSTICH  
Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T-27-8. Please refer to your testimony at page 5, lines 1-11.

- (a) Please define the terms "implicit volume variability" and "cost pool adjustment factor" as you use these terms in line 5 and provide an example of each.
- (b) Have you assumed the mail processing variabilities to be at or near 100 percent for the purpose of calculating mail processing cost savings? Please explain fully any negative answer.
- (c) Please provide a representative calculation of a cost savings for Standard (A) mail using the variabilities contained in USPS-T-17, Table 1.
- (d) What is the economic justification for using volume variabilities of less than 100 percent to calculate attributable costs of mail processing on the one hand, and using variabilities at or near 100 percent to calculate cost savings for discounts on the other hand? Please explain fully.

OCA/USPS-T-27-9. Please refer to your testimony at page 8, lines 3-6. What would change in your analysis if you used 1999 data for the purpose of calculating Standard (A) mail nonletter cost differences? Please explain fully.

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Stephanie Wallace

Washington, D.C. 20268-0001  
February 11, 2000