

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 VAN-TY-SMITH TO INTERROGATORIES OF  
THE DIRECT MARKETING ASSOCIATION, INC.  
(DMA/USPS-T17-1-2)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T17-1-2, filed on January 28, 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, Ratemaking



Susan M. Duchek

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February 11, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO DMA INTERROGATORIES**

**DMA/USPS-T17-1.** Please refer to Table 2 (Page 26) of your testimony. Please disaggregate dollar-weighted tally costs by cost pool and by the same categories as in Table 2 (e.g., Direct Tallies - Pieces, Direct Tallies - Items, Direct Tallies - Containers, Mixed Tallies - Uncounted Items). Please provide in an electronic spreadsheet format and in a format similar to Table 2.

**RESPONSE TO DMA/USPS-T17-1**

The excel table for the disaggregated data for Table 2 is filed in LR-I-184,

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO DMA INTERROGATORIES**

**DMA/USPS-T17-2.** Please refer to Table 3 of your testimony, your library reference LR-H-106, and pages 140-142 of the Docket No. R97-1 Opinion and Recommended Decision. Note that in the Docket No. R97-1 Opinion and Recommended Decision the Postal Rate Commission "conclude[d] that mixed mail costs in a given allied MODS pool should be distributed in proportion to the direct costs across all MODS pools."

a. Did you or anyone else working for the Postal Service (whether as an employee or contractor) perform a distribution of mail processing costs that both distributes mixed-mail tallies in allied operations in the way that the Commission recommended in Docket No. R97-1 and distributes not-handling tallies at allied operations according to the distribution method you are proposing in your testimony?

1. If so, please provide summary results from the method in an electronic spreadsheet format and in a format similar to Table 3 of your testimony.
2. If so, please provide as a library reference all of the programs and data sources you used to implement this distribution method.

b. Did you or anyone else working for the Postal Service (whether as an employee or contractor) perform a distribution of mail processing costs that distributes mixed-mail tallies at allied operations using direct tallies from distribution operations (in addition to direct allied tallies) but in a manner that differs from the Commission's recommendation in Docket No. R97-1?

1. If so, please describe all of these distribution methods.
2. If so, please provide summary results from these distribution methods in an electronic spreadsheet format and in a format similar to Table 3 of your testimony.

**RESPONSE TO DMA/USPS-T17-2.**

a. No.

1. and 2. Not applicable.

b. No.

1. and 2. Not applicable.

## DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Ty Smith

Dated: 2/11/00

**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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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