

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 DANIEL TO INTERROGATORY OF DIRECT MARKETING  
ASSOCIATION REDIRECTED FROM WITNESS SMITH  
(ANM/USPS-T21—5)**

The United States Postal Service hereby provides the response of witness Daniel (USPS-T-28) to the following interrogatory of Direct Marketing Association, redirected from witness Smith (USPS-T-21): DMA/USPS-T21—5, filed on January 28, 2000. A partial objection to this interrogatory was filed on February 7, 2000, although the Postal Service indicated that it would respond to the interrogatory in its entirety.


The 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

  
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Anthony Alverno  
Attorney

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February 11, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO  
INTERROGATORY OF DIRECT MARKETING ASSOCIATION, INC.  
REDIRECTED FROM WITNESS SMITH**

**DMA/USPS-T21-5.** By what percent did the unit city carrier in-office cost for Standard (A) Regular flats increase from FY 1997 to FY 1998? What was the unit cost in FY 1997? What was it in FY 1998?

**RESPONSE:**

The unit city carrier in-office cost (CS/C 6.1 and 6.2 in-office direct labor plus support) per RPW Standard Mail (A) Regular flat increased 21 percent from FY 1997 to FY 1998. The total city carrier in-office unit cost per RPW Standard Mail (A) Regular flat was 2.0 cents in FY 1997 and 2.4 cents in FY 1998.

**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: 2/11/00

## 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.

  
\_\_\_\_\_  
Anthony Alverno

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