

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

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO QUESTIONS 10 THROUGH 12 OF  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 1  
(February 14, 2000)

The United States Postal Service hereby provides responses to the following questions in Presiding Officer's Information Request No. 1, dated January 31, 2000: 10-12.

Each question 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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Scott L. Reiter

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February 14, 2000

**RESPONSE OF USPS WITNESS PLUNKETT TO PRESIDING OFFICER'S  
INFORMATION REQUEST NO.1 QUESTIONS 10-12**

**POIR No. 1 Question 10.** Please refer to USPS-LR I-125, H-I.

a. The note at the bottom of page 2 states, "Excludes 1,931,382 Alaska Bypass pieces and 1,556,914 OMAS pieces." Please explain how these numbers are calculated and provide cites.

b. Please also provide the revenue and revenue adjustment figures for H-I.

**POIR No. 1 Question 10 Response**

a-b. Estimates for OMAS and Alaska Bypass volumes are incorporated into billing determinant volumes based on mailing statement data collected as part of the RPW system.

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**POIR No. 1 Question 11.** Please refer to USPS-T-36, Attachment A. On page 1 the total air postage pounds for TYBR is 70,062,344. On page 2 the figure used is 64,784,248. Please reconcile these numbers.

**POIR No.1 Question 11 Response.** The correct total for TYBR postage pounds is 83,598,835. A corrected version of attachment A will be filed with other errata shortly.

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**POIR NO.1 Question 12.** Please refer to USPS-T-36, Attachment E.

a. The sources listed are WP I.A page 1 and WP I.A pages 6 and 7. Are these workpapers included in LR-I-62 "Materials related to Testimony of witness Plunkett, USPS-T-36"?

b. If so please provide a crosswalk between the sources listed in USPS-T-3 and the library reference. For example, is WP I.A pages 6 and 7, the same as LR-I-62 'BD Volumes'?

**POIR NO.1 Question 12 Response.**

a-b References to WP 1.A are for volume data. Test year volumes are presented in my Attachment D, and are distributed on the basis of FY 98 billing determinant volumes. Billing determinant data are in LR-USPS-125. The billing determinants for parcel post are also contained in LR-USPS-62.

**DECLARATION**

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

  
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Dated: 2-14-00

**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.



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Scott L. Reiter

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