

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 KASHANI TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T14-2-3)

The United States Postal Service hereby provides the responses of witness Kashani to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T14-2-3, filed on February 4, 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 18, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KASHANI  
TO INTERROGATORY OF  
OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T14-2** Please refer to Exhibit 14K, page 2, C/S-2, Supervisors and Technicians where total costs are \$3,810,452. However, Exhibit 14M, page 9, shows total costs for Supervisors and Technicians as \$3,806,311. Please explain the \$4,141 difference.

**RESPONSE**

The difference of \$4,141 results from a control string error that mistakenly included component (603) in the total for Cost Segment 2 in Exhibit 14M, page 9. As shown on page 764 of Library Reference I-4, component 618 is used to calculate the total costs for C/S-2, Supervisors and Technicians, that appear on page 9 of Exhibit 14M. Also on page 764, component 603 is added to component 618 and component 601 should have been used instead of 603. The correct amount is reflected in Exhibit 14K. See Errata USPS-T-14, 2/18/2000 for revised pages.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KASHANI  
TO INTERROGATORY OF  
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**OCA/USPS-T14-3** Please refer to Exhibit 14K, page 2, C/S-3, Clerks and Mailhandlers where total costs are \$19,375,248. However, Exhibit 14M, page 9, shows total costs for Clerks and Mailhandlers as \$19,292,305. Please explain the \$82,943 difference.

**RESPONSE**

The difference of \$82,943 is due to the exclusion of the Special Delivery Messengers in my Exhibit 14M, page 9 for Clerks and Mailhandlers. The correct amounts are depicted on page 2 of my Exhibit 14K. When I transferred Special Delivery Messengers from Cost Segment 9 to Cost Segment 3, I did not make this adjustment in my Exhibit 14M, "Summary of Accrued Cost by Segment and Component Detailing Attributable Cost" as shown on pages 9 through 12. A simple formatting adjustment in USPS-LR-I-4, pages 713-714 corrects the total for C/S-3, Clerks and Mailhandlers in my Exhibit 14M. See Errata USPS-T-14, 2/18/2000 for revised pages.

**DECLARATION**

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

Cameron Kashani

Dated: 2/18/00

**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 black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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