

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS VAN-TY-SMITH TO INTERROGATORIES OF
TIME WARNER, INC.
(TW/USPS-T17-1-4)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of Time Warner, Inc.: TW/USPS-T17-1-4, filed on February 7, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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February 22, 2000

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

TW/USPS-T17-1 Please provide electronic spreadsheet (e.g., Excel) formats for all the tables presented in LR-I-106. If an electronic spreadsheet format has already been provided for some or all of these tables, please identify all relevant files.

RESPONSE TO TW/USPS-T17-1.

The excel spreadsheets of all the tables presented in LR-I-106 are contained in the diskette filed in USPS-LR-I-189. Note that Tables II-1 (A through C) in USPS-LR-I-106 correspond to Table 3 in my testimony, which can be obtained from the PRC website.

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TW/USPS-T17-2 Please refer to the breakdown of Non-MODS clerk/mailhandler costs in Tables I-4A and I-4B in LR-I-106.

- a. Please confirm that this breakdown was produced using IOCS tally information. If not confirmed, please identify all data and explain how they were used.
- b. Please name the SAS program(s) which produced the above mentioned tables and explain exactly where and under what file name(s) it (they) can be found.
- c. Please name the IOCS file used to produce these tables and explain under what file name and in what library reference it can be found.
- d. Besides uniform operation codes, please explain precisely what IOCS data items were used to associate each non-MODS mail processing tally with individual pools. Please identify the fields of IOCS tally records that were used, the specific IOCS questions that those fields contain the answer to, and the logic applied to select the pool for each tally.
- e. Precisely what characteristics of an IOCS tally causes it to be included in the MANF pool? What causes it to be included in the allied pool?
- f. For each mail processing Non-MODS cost pool specified in Tables 1-4A and 1-4B, please provide a further breakdown by mail processing uniform operation code.

RESPONSE TO TW/USPS-T17-2.

- a. Confirmed for Table I-4A.

For Table I-4B, the breakdown of the costs is based on IOCS tally dollars. But the total costs which are applied to this breakdown are those described in formula (i) and (ii), page I-3, Part I of LR-I-106.

- b. The immediate SAS program which produced the above mentioned tables is NONMOD1, lines 00070093-00935098, with Table I-4A and Table I-4B identified as titles of SAS outputs at lines 00830098 and 00931098. The IOCS Non-MODS



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tally file used as input into the SAS program NONMOD1 is created by the SAS program MBC which partitions the SAS IOCS file into three temporary tally files, BMCS1, MODS1 and NONMODS1 (see page II-38, Part 2, USPS LR-I-106). The NONMODS1 temporary tally file then serves as the NMOD input into the SAS program NONMOD1 (see line 00080093). Both SAS programs, NONMOD1 and MBC, are contained in the diskette filed in USPS LR-I-106. The JCL document, (which is also contained in the diskette filed in USPS LR-I-106) provides the set up and sequence for running the SAS programs.

- c. The IOCS SAS file used in Program MBC is the mainframe IOCS SAS file 'ALB.HQTAL98.BYITEM.PRCALL' listed in the JCL document contained in the diskette filed in USPS LR-I-106 (at line number 00120099). The PC SAS version of the IOCS mainframe SAS file is filed in USPS-LR-I-12 under the name 'PRC98.SD2'. USPS-LR-I-12 also includes a flat file version of this data under the name 'PRCFLAT.DAT.' Both PC SAS and flat file versions of the IOCS are documented in Appendix H of USPS-LR-I-12. Please note that some minor modifications may be required for a mainframe SAS program to execute properly in a PC environment.

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RESPONSE TO TW/USPS-TI7-2. (Cont'd)

- d. The IOCS data items used to associate each non-MODS mail processing tally with individual pools and the logic applied to select the pool for each tally are contained in the SAS program NONMOD1 (see the answer to b. above). They are also described on page II-47, Part II of USPS LR-I-106. The 'PRC98.SD2' PC SAS file already contains the names of the fields of IOCS tally records that were used, as listed in NONMOD1. To identify the same fields in the 'PRCFLAT.DAT' flat file, please see Appendix H of USPS-LR-I-12, which contains the program that writes the SAS file into a flat file and gives the field positions for the flat file. The specific IOCS questions that those fields contain the answer to and the value assignments for those fields are contained in Appendix A of USPS-LR-I-12.
- e. The responses to IOCS Question 19 are the basis for including the tallies in the MANF. The responses to IOCS Questions 19 and 18 are the basis for including the tallies in the ALLIED cost pool (see the answers to b. and d. above). For further details on these IOCS questions, please see Chapter 11 of Handbook F-45, In-Office Cost System, Field Operating Instructions filed in USPS LR-I-14,.
- f. A further breakdown by mail processing uniform operation code of each mail processing Non-MODS cost pool specified in Tables I-4A and I-4B is provided in the two tables attached to this response.

Response to TW/USPS-T-17-2F
 TABLE I - 4A
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME WHICH
 IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL	F260 (TALLY OPERATION ROUTE CODE ALB095)										Total
Frequency	00	01	02	03	04	05	06	07	08	09	
ALLIED	0	64375	45659	11846	103383	22408	0	45613	66423	0	502894
AUTO/MEC	0	2408.9	8045.2	7380.6	16243	6953.6	0	675.38	632.44	0	63643
EXPRESS	0	0	0	0	0	0	0	0	0	0	13701
MANF	227.28	6543.9	19402	7793.2	123898	16612	0	637.14	1492.3	0	350261
MANL	0	12396	57471	20453	245646	34086	0	1235	4297.7	0	741337
MANP	0	2357.3	3868.7	1561.6	34392	7588.2	0	834.63	1369.2	0	91457
MISC	39201	6841.3	3357.2	1369.3	6696.5	2105.6	44537	0	555.5	0	221024
REGISTRY	0	0	0	0	0	0	0	0	0	0	30794
Z BREAKS	2221.2	7964.5	13430	69017	1060	83036	2826.3	0	8328.2	0	198921
09	0	0	0	0	0	0	0	0	0	1084077	1084077
10	0	0	0	0	0	0	0	0	0	0	452706
17	0	0	0	0	0	0	0	0	0	0	12631
24	0	0	0	0	0	0	0	0	0	0	30773
25	0	0	0	0	0	0	0	0	0	0	7095.7
26	0	0	0	0	0	0	0	0	0	0	14137
6522	0	0	0	0	0	0	0	0	0	0	51368
Total	41649.4	102887	151233	119421	531318	172790	47363.4	48995	83098.8	1084077	3866819

(Continued)

Response to TW/USPS-T-17-2F
 TABLE I - 4A
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME WHICH
 IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL	F260 (TALLY OPERATION ROUTE CODE ALB095)										Total
Frequency	10	11	12	13	14	15	16	17	18	20	
ALLIED	0	38164	2854.4	3187.1	0	3801.6	146.62	0	0	58580	502894
AUTO/MEC	0	325.37	0	350.03	0	488.9	0	0	0	351.14	63643
EXPRESS	0	0	0	0	0	0	0	0	0	0	13701
MANF	0	16147	1302.2	2358.2	0	7059.3	1803.7	0	0	10484	350261
MANL	0	56912	4726	6614.2	0	16791	2960.4	0	0	37650	741337
MANP	0	2196.3	241.51	762.75	0	1207	563.5	0	0	1428.5	91457
MISC	0	322.53	0	0	40345	56603	0	0	0	0	221024
REGISTRY	0	0	0	0	0	0	0	0	30794	0	30794
Z BREAKS	0	0	0	0	2946	5380.9	253.3	0	1872.7	0	198921
09	0	0	0	0	0	0	0	0	0	0	1084077
10	452706	0	0	0	0	0	0	0	0	0	452706
17	0	0	0	0	0	0	0	12631	0	0	12631
24	0	0	0	0	0	0	0	0	0	0	30773
25	0	0	0	0	0	0	0	0	0	0	7095.7
26	0	0	0	0	0	0	0	0	0	0	14137
6522	51368	0	0	0	0	0	0	0	0	0	51368
Total	504073	114067	9124.11	13272.4	43290.6	91332.2	5727.52	12631.4	32666.4	108493	3866819

(Continued)

Response to TW/USPS-T-17-2F
 TABLE I - 4A
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME WHICH
 IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL	F260 (TALLY OPERATION ROUTE CODE ALB095)										Total
Frequency	21	22	23	24	25	26	27	28	29		
ALLIED	0	0	0	0	0	0	0	310.31	596.36	35548	502894
AUTO/MEC	0	0	0	0	0	0	0	2071.8	11377	6339	63643
EXPRESS	0	13701	0	0	0	0	0	0	0	0	13701
MANF	0	0	0	0	0	0	0	3076	310.01	131114	350261
MANL	0	0	0	0	0	0	0	5271.2	322.93	234504	741337
MANP	0	0	0	0	0	0	0	639.28	0	32446	91457
MISC	808.95	0	18282	0	0	0	0	0	0	0	221024
REGISTRY	0	0	0	0	0	0	0	0	0	0	30794
Z BREAKS	0	584.46	0	0	0	0	0	0	0	0	198921
09	0	0	0	0	0	0	0	0	0	0	1084077
10	0	0	0	0	0	0	0	0	0	0	452706
17	0	0	0	0	0	0	0	0	0	0	12631
24	0	0	0	30773	0	0	0	0	0	0	30773
25	0	0	0	0	7095.7	0	0	0	0	0	7095.7
26	0	0	0	0	0	14137	0	0	0	0	14137
6522	0	0	0	0	0	0	0	0	0	0	51368
Total	808.946	14286	18281.9	30773.1	7095.65	14137.3	11368.6	12606.7	439951	3866819	

Response to TW/USPS-T-17-2F
 TABLE I - 4B
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME COST
 WHICH IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL F260 (TALLY OPERATION ROUTE CODE ALB095)

Frequency	00	01	02	03	04	05	06	07	08	09	Total
ALLIED	0	68388	48506	12584	109828	23805	0	48457	70565	0	534247
AUTO/MEC	0	2559.1	8546.8	7840.7	17256	7387.2	0	717.49	671.87	0	67611
EXPRESS	0	0	0	0	0	0	0	0	0	0	14556
MANF	241.45	6951.8	20612	8279.1	131623	17648	0	676.86	1585.3	0	372098
MANL	0	13169	61054	21728	260961	36211	0	1311.9	4565.6	0	787556
MANP	0	2504.2	4109.9	1659	36536	8061.3	0	886.67	1454.6	0	97159
MISC	41645	7267.8	3566.5	1454.6	7114	2236.9	47314	0	590.13	0	234804
REGISTRY	0	0	0	0	0	0	0	0	0	0	32714
Z BREAKS	2359.7	8461.1	14267	73320	1126.1	88213	3002.5	0	8847.5	0	211323
09	0	0	0	0	0	0	0	0	0	1155494	1155494
10	0	0	0	0	0	0	0	0	0	0	480930
17	0	0	0	0	0	0	0	0	0	0	13419
24	0	0	0	0	0	0	0	0	0	0	32800
25	0	0	0	0	0	0	0	0	0	0	7563.1
26	0	0	0	0	0	0	0	0	0	0	15069
6522	0	0	0	0	0	0	0	0	0	0	54570
Total	44246.1	109302	160661	126866	564444	183562	50316.3	52049.7	88279.6	1155494	4111913

(Continued)

Response to TW/USPS-T-17-2F
 TABLE I - 4B
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME COST
 WHICH IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL	F260 (TALLY OPERATION ROUTE CODE ALB095)										Total
Frequency	10	11	12	13	14	15	16	17	18	20	
ALLIED	0	40543	3032.4	3385.8	0	4038.6	155.76	0	0	62232	534247
AUTO/MEC	0	345.66	0	371.85	0	519.39	0	0	0	373.03	67611
EXPRESS	0	0	0	0	0	0	0	0	0	0	14556
MANF	0	17154	1383.4	2505.3	0	7499.4	1916.1	0	0	11137	372098
MANL	0	60460	5020.6	7026.6	0	17838	3145	0	0	39997	787556
MANP	0	2333.2	256.56	810.3	0	1282.3	598.63	0	0	1517.6	97159
MISC	0	342.63	0	0	42860	60132	0	0	0	0	234804
REGISTRY	0	0	0	0	0	0	0	0	32714	0	32714
Z BREAKS	0	0	0	0	3129.6	5716.4	269.09	0	1989.5	0	211323
09	0	0	0	0	0	0	0	0	0	0	1155494
10	480930	0	0	0	0	0	0	0	0	0	480930
17	0	0	0	0	0	0	0	13419	0	0	13419
24	0	0	0	0	0	0	0	0	0	0	32800
25	0	0	0	0	0	0	0	0	0	0	7563.1
26	0	0	0	0	0	0	0	0	0	0	15069
6522	54570	0	0	0	0	0	0	0	0	0	54570
Total	535500	121179	9692.96	14099.9	45989.6	97026.4	6084.61	13419	34703	115257	4111913

(Continued)

Response to TW/USPS-T-17-2F
 TABLE I - 4B
 TOTAL NONMODS IOCS TALLY DOLLAR WEIGHTS BY
 MAIL PROCESSING POOLS AND BY IOCS OPERATION CODES
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME COST
 WHCIH IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

TABLE OF POOL BY F260

POOL	F260 (TALLY OPERATION ROUTE CODE ALB095)									
Frequency	21	22	23	24	25	26	27	28	29	Total
ALLIED	0	0	0	0	0	0	329.65	633.54	37764	534247
AUTO/MEC	0	0	0	0	0	0	2201	12087	6734.2	67611
EXPRESS	0	14556	0	0	0	0	0	0	0	14556
MANF	0	0	0	0	0	0	3267.8	329.34	139289	372098
MANL	0	0	0	0	0	0	5599.8	343.06	249124	787556
MANP	0	0	0	0	0	0	679.14	0	34469	97159
MISC	859.38	0	19422	0	0	0	0	0	0	234804
REGISTRY	0	0	0	0	0	0	0	0	0	32714
Z BREAKS	0	620.9	0	0	0	0	0	0	0	211323
09	0	0	0	0	0	0	0	0	0	1155494
10	0	0	0	0	0	0	0	0	0	480930
17	0	0	0	0	0	0	0	0	0	13419
24	0	0	0	32800	0	0	0	0	0	32800
25	0	0	0	0	7563.1	0	0	0	0	7563.1
26	0	0	0	0	0	15069	0	0	0	15069
6522	0	0	0	0	0	0	0	0	0	54570
Total	859.38	15176.6	19421.7	32800.4	7563.11	15068.6	12077.4	13392.7	467380	4111913

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

TW/USPS-T17-3 Please provide a breakdown of FY96 non-MODS costs similar to that shown in Tables I-4A and I-4B, using FY96 IOCS data.

RESPONSE TO TW/USPS-T17-3

A breakdown of FY96 Non-MODS costs similar to that shown in Tables I-4A and I-4B, using FY96 IOCS data, is provided in the two tables attached to this response. The total Non-MODS cost for the attached Table I-4B corresponds to the one provided on page I-5, Table I-1, Part I of LR-H-146 in Docket No. R97-1 (see 'Total for NONMODS Facilities'), which exclude the FY96 clerk and mailhandler uniform allowance and lump sum. These excluded costs are incorporated in Cost Segment 3 of the B Workpapers of Witness Alexandrovitch (USPS-T-5) in Docket No. R97-1.

Response to TW/USPS-T-17-3
 Breakdown of BY96 Non-MODS Costs similar to Table 1-4A
 TOTAL NONMODS IOCS DOLLAR WEIGHTS BY MAIL PROC. POOLS AND
 BY IOCS OPERATION CODES FOR NON-MAIL PROC. TALLIES.
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME WHICH
 IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

POOL	Frequency	Percent	Cumulative Frequency	Cumulative Percent
ALLIED	502893.8	13.0	502893.8	13.0
AUTO/MEC	63643.23	1.6	566537	14.7
EXPRESS	13701.5	0.4	580238.5	15.0
MANF	350261.2	9.1	930499.7	24.1
MANL	741336.8	19.2	1671836	43.2
MANP	91456.61	2.4	1763293	45.6
MISC	221024.4	5.7	1984317	51.3
REGISTRY	30793.66	0.8	2015111	52.1
Z BREAKS	198920.7	5.1	2214032	57.3
09	1084077	28.0	3298108	85.3
10	452705.6	11.7	3750814	97.0
17	12631.45	0.3	3763445	97.3
24	30773.09	0.8	3794219	98.1
25	7095.653	0.2	3801314	98.3
26	14137.29	0.4	3815451	98.7
6522	51367.88	1.3	3866819	100.0

Response to TW/USPS-T-17-3
 Breakdown of BY96 Non-MODS Costs similar to Table 1-4B
 TOTAL NONMODS POOL COSTS BY MAIL PROC. POOLS AND
 BY IOCS OPERATION CODES FOR NON-MAIL PROC. TALLIES.
 MAIL PROC. POOLS DO NOT INCLUDE DISTRIBUTED BREAK TIME COST
 WHICH IS LISTED AS A SEPARATE POOL (I.E. Z BREAKS).

POOL	Frequency	Percent	Cumulative Frequency	Cumulative Percent
ALLIED	527983.1	13.0	527983.1	13.0
AUTO/MEC	66818.39	1.6	594801.5	14.7
EXPRESS	14385.06	0.4	609186.5	15.0
MANF	367735.7	9.1	976922.2	24.1
MANL	778321.9	19.2	1755244	43.2
MANP	96019.37	2.4	1851263	45.6
MISC	232051.3	5.7	2083315	51.3
REGISTRY	32329.95	0.8	2115645	52.1
Z BREAKS	208844.8	5.1	2324489	57.3
09	1138161	28.0	3462651	85.3
10	475291	11.7	3937941	97.0
17	13261.63	0.3	3951203	97.3
24	32308.36	0.8	3983511	98.1
25	7449.654	0.2	3990961	98.3
26	14842.59	0.4	4005804	98.7
6522	53930.62	1.3	4059734	100.0

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

TW/USPS-T17-4

- a. Please apply the logic used to create Tables I-4A and I-4B in LR-106 to the IOCS clerk and mailhandler tallies assigned to each of the following MODS cost pools: LD41, LD43, LD44, LD48, LD49 and LD79. Present results in the same manner as is used in tables I-4A and I-4B.
- b. Is it fair to conclude that most allied labor performed in Function 4 offices is recorded under LD43?

RESPONSE TO TW/USPS-T17-4

- a. The breakdown of the LD41, LD43, LD44, LD48, LD49 and LD79 MODS cost pools into categories similar to the Non-MODS pools shown in Tables I-4A and I-4B is provided in the two tables attached to this response. The LD48 group includes the LD48 EXP, LD48_SSV and the 1SUPP_F4 cost pools.
- b. This does not seem to be the case. From the two tables provided in response to a. above, the LD43 cost pool share of the total "Allied" cost (row pct) is about 37 percent.

Response to TW/USPS-T17-4
 Breakdown of Function 4 LDC Costpools and LDC79 Costpool
 Into Non-MODS Categories Exhibited in Tables I-4A
 of LR-I-106 - based on IOCS Tally Dollars

TABLE OF POOL BY COSTPOOL

Frequency Percent Row Pct	COSTPOOL (MODS Cost Pools)						Total
	LD41	LD43	LD44	LD48	LD49	LD79	
ALLIED	1439.8 0.09 0.51	102513 6.07 36.59	44747 2.65 15.97	34673 2.05 12.38	15983 0.95 5.71	80802 4.78 28.84	280159 16.59
AUTO/MEC	35009 2.07 73.93	3621.3 0.21 7.65	445.98 0.03 0.94	1613.3 0.10 3.41	4371.1 0.26 9.23	2292.3 0.14 4.84	47353 2.80
EXPRESS	0 0.00 0.00	1566.1 0.09 14.03	577.44 0.03 5.17	8780.5 0.52 78.67	0 0.00 0.00	236.8 0.01 2.12	11161 0.66
MANP	237.34 0.01 0.20	99338 5.88 83.40	10515 0.62 8.83	7652.8 0.45 6.42	690.05 0.04 0.58	683.28 0.04 0.57	119117 7.05
MANL	851.86 0.05 0.36	164748 9.76 69.13	49162 2.91 20.63	20078 1.19 8.43	1516.1 0.09 0.64	1953.6 0.12 0.82	238310 14.11
MANP	0 0.00 0.00	70806 4.19 90.78	1715.8 0.10 2.20	5292.5 0.31 6.79	0 0.00 0.00	187.23 0.01 0.24	78001 4.62
MISC	290.34 0.02 0.08	28635 1.70 7.95	5894.1 0.35 1.64	102388 6.06 28.42	219486 13.00 60.92	3586.7 0.21 1.00	360280 21.33
REGISTRY	0 0.00 0.00	2743.9 0.16 17.14	278.94 0.02 1.74	12809 0.76 79.99	0 0.00 0.00	181.11 0.01 1.13	16013 0.95
Total	46335.7 2.74	615671 36.46	153598 9.10	425763 25.21	293963 17.41	153370 9.08	1688701 100.00

(Continued)

Response to TW/USPS-T17-4
 Breakdown of Function 4 LDC Costpools and LDC79 Costpool
 Into Non-MODS Categories Exhibited in Tables I-4A
 of LR-I-106 - based on IOCS Tally Dollars

TABLE OF POOL BY COSTPOOL

POOL(Non-MODS Categories)		COSTPOOL(MODS Cost Pools)					Total
Frequency Percent Row Pct	LD41	LD43	LD44	LD48	LD49	LD79	
Z BREAKS	5352.4	85461	15803	20446	35062	8530.9	170654
	0.32	5.06	0.94	1.21	2.08	0.51	10.11
	3.14	50.08	9.26	11.98	20.55	5.00	
09	346.5	8302.3	7515.3	49423	110.92	2954.7	68653
	0.02	0.49	0.45	2.93	0.01	0.17	4.07
	0.50	12.09	10.95	71.99	0.16	4.30	
10	2134	33332	8993.8	144295	10907	47061	246722
	0.13	1.97	0.53	8.54	0.65	2.79	14.61
	0.86	13.51	3.65	58.48	4.42	19.07	
17	0	107.94	414.1	5539	676.06	1628.2	8365.3
	0.00	0.01	0.02	0.33	0.04	0.10	0.50
	0.00	1.29	4.95	66.21	8.08	19.46	
24	0	886.28	3876.9	2037.5	0	0	6800.6
	0.00	0.05	0.23	0.12	0.00	0.00	0.40
	0.00	13.03	57.01	29.96	0.00	0.00	
25	0	1101.5	922.08	3197.4	0	0	5221
	0.00	0.07	0.05	0.19	0.00	0.00	0.31
	0.00	21.10	17.66	61.24	0.00	0.00	
26	0	327.86	232.86	1711.2	0	0	2271.9
	0.00	0.02	0.01	0.10	0.00	0.00	0.13
	0.00	14.43	10.25	75.32	0.00	0.00	
6522	674.21	12181	2503.4	5827.5	5160.4	3270.9	29617
	0.04	0.72	0.15	0.35	0.31	0.19	1.75
	2.28	41.13	8.45	19.68	17.42	11.04	
Total	46335.7	615671	153598	425763	293963	153370	1688701
	2.74	36.46	9.10	25.21	17.41	9.08	100.00

Response to TW/USPS-T17-4
 Breakdown of Function 4 LDC Costpools and LDC79 Costpool
 Into Non-MODS Categories Exhibited in Tables I-4B
 of LR-I-106 - based on Cost Pool Dollars

TABLE OF POOL BY COSTPOOL

POOL(Non-MODS Categories)	COSTPOOL(MODS Cost Pools)						Total
	LD41	LD43	LD44	LD48	LD49	LD79	
ALLIED	1051.2	93777	40314	33010	14391	74655	257198
	0.07	6.04	2.60	2.13	0.93	4.81	16.58
	0.41	36.46	15.67	12.83	5.60	29.03	
AUTO/MBC	25560	3312.7	401.8	1537.3	3935.6	2117.9	36865
	1.65	0.21	0.03	0.10	0.25	0.14	2.38
	69.33	8.99	1.09	4.17	10.68	5.75	
EXPRESS	0	1432.7	520.24	8315.7	0	218.79	10487
	0.00	0.09	0.03	0.54	0.00	0.01	0.68
	0.00	13.66	4.96	79.29	0.00	2.09	
MANP	173.28	90872	9473.8	7243.7	621.29	631.3	109016
	0.01	5.86	0.61	0.47	0.04	0.04	7.03
	0.16	83.36	8.69	6.64	0.57	0.58	
MANL	621.93	150708	44293	19681	1365.1	1805	218474
	0.04	9.71	2.85	1.27	0.09	0.12	14.08
	0.28	68.98	20.27	9.01	0.62	0.83	
MANP	0	64772	1545.8	5046.5	0	172.99	71537
	0.00	4.17	0.10	0.33	0.00	0.01	4.61
	0.00	90.54	2.16	7.05	0.00	0.24	
MISC	211.97	26194	5310.2	103390	197615	3313.8	336035
	0.01	1.69	0.34	6.66	12.74	0.21	21.66
	0.06	7.80	1.58	30.77	58.81	0.99	
REGISTRY	0	2510.1	251.31	13038	0	167.33	15967
	0.00	0.16	0.02	0.84	0.00	0.01	1.03
	0.00	15.72	1.57	81.66	0.00	1.05	
Total	33828.8	563203	138383	409711	264671	141702	1551498
	2.18	36.30	8.92	26.41	17.06	9.13	100.00

(Continued)

Response to TW/USPS-T17-4
 Breakdown of Function 4 LDC Costpools and LDC79 Costpool
 Into Non-MODS Categories Exhibited in Tables I-4B
 of LR-I-106 - based on Cost Pool Dollars

TABLE OF POOL BY COSTPOOL

Frequency Percent Row Pct	POOL(Non-MODS Categories)						COSTPOOL(MODS Cost Pools)	Total
	LD41	LD43	LD44	LD48	LD49	LD79		
Z BREAKS	3907.6	78178	14238	19891	31568	7881.9	155663	
	0.25	5.04	0.92	1.28	2.03	0.51	10.03	
	2.51	50.22	9.15	12.78	20.28	5.06		
09	252.97	7594.8	6770.9	46589	99.871	2729.9	64038	
	0.02	0.49	0.44	3.00	0.01	0.18	4.13	
	0.40	11.86	10.57	72.75	0.16	4.26		
10	1558	30491	8102.9	134559	9820	43481	228012	
	0.10	1.97	0.52	8.67	0.63	2.80	14.70	
	0.68	13.37	3.55	59.01	4.31	19.07		
17	0	98.745	373.08	5186.5	608.7	1504.3	7771.3	
	0.00	0.01	0.02	0.33	0.04	0.10	0.50	
	0.00	1.27	4.80	66.74	7.83	19.36		
24	0	810.75	3492.8	1893.1	0	0	6196.7	
	0.00	0.05	0.23	0.12	0.00	0.00	0.40	
	0.00	13.08	56.37	30.55	0.00	0.00		
25	0	1007.7	830.74	3059.4	0	0	4897.8	
	0.00	0.06	0.05	0.20	0.00	0.00	0.32	
	0.00	20.57	16.96	62.46	0.00	0.00		
26	0	299.92	209.8	1655.9	0	0	2165.6	
	0.00	0.02	0.01	0.11	0.00	0.00	0.14	
	0.00	13.85	9.69	76.46	0.00	0.00		
6522	492.22	11143	2255.4	5616.1	4646.2	3022.1	27175	
	0.03	0.72	0.15	0.36	0.30	0.19	1.75	
	1.81	41.00	8.30	20.67	17.10	11.12		
Total	33828.8	563203	138383	409711	264671	141702	1551498	
	2.18	36.30	8.92	26.41	17.06	9.13	100.00	

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: 2/22/00

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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February 22, 2000**