

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 KINGSLEY TO INTERROGATORY OF
ASSOCIATION FOR POSTAL COMMERCE
(PostCom/USPS-T10-1)

The United States Postal Service hereby provides the response of witness Kingsley to the following interrogatory of the Association for Postal Commerce: PostCom/USPS-T10-1, filed on February 7, 2000.

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



Susan M. Duchek

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February 22, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION FOR POSTAL COMMERCE**

POSTCOM/USPS-T10-1. Please provide a source (or sources) for the figures set out at lines 13-16 of Page 32 of your testimony and provide copies of any source documents that are not published or available in this docket.

Response:

As stated in my testimony, the figures noted came from the NWRS (National Workhour Reporting System) cost per hour by LDC (Labor Distribution Code), multiplied by the MODS (Management Operating Data System) hours and divided by TPH (Total Pieces Handled). This calculation came from numbers in the above mentioned systems which are part of the Corporate Data Base. The National Workhour Reporting System includes the workhours of all clerks nationally. The Labor Distribution Code distinguishes the automation workhours from manual workhours. The Management Operating Data System includes plant processing data. Total Pieces Handled is the number of pieces handled and finalized from a particular operation in the plant.

DECLARATION

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

Linda A. Kingsley

Date: 2/17/00

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 above a horizontal line.

Susan M. Duchek

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