

**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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS YACOBUCCI
(PostCom/USPS-T-25-3)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatory to USPS witness Yacobucci PostCom/USPS-T-25-3. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/USPS-T-25-3. Please refer to LR-I-90. In particular, refer to Worksheet "Scenario Costs" and the tables titled "Standard (A) Regular Cost Averages - Actual" and "Standard (A) Regular Cost Averages - Normalized Auto-Related Cost Savings" on Worksheet "Cost Averaging."

(a) Please confirm that the figures in the referenced tables are unit costs by rate category and that these unit costs are developed by (1) weighting the modeled unit volume variable costs from the "Scenario Costs" worksheet (by volume) within rate category; and (2) applying CRA adjustment factors to the modeled unit costs. If not confirmed, please explain.

(b) Please confirm that the unit costs for 3/5 digit nonautomation flats are, in principle, weighted averages of the unit costs of 3-digit nonautomation flats and 5 digit nonautomation flats and that the unit costs for 3/5 digit automation are, in principle, weighted averages of the costs of 3 digit automation flats and 5 digit automation flats. If not confirmed, please explain

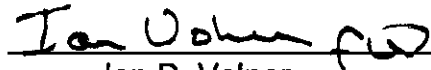
(c) Please explain in detail how to modify LR-I-90 to deaverage the unit costs for 3/5 digit flats into individual unit costs for 3 digit flats and 5 digit flats so that it provides actual cost averages and normalized cost averages for six types of Standard (A) Regular flats: (1) basic nonautomation; (2) basic automation; (3) 3 digit nonautomation; (4) 3 digit automation; (5) 5 digit nonautomation; and (6) 5 digit automation.

(d) Using this method, what are the actual cost averages and normalized cost averages for the six types of Standard (A) Regular flats mentioned in part (c)?

(e) Please disaggregate Standard (A) Regular flat volume from the mail characteristics study into the six types of flats mentioned in part (c).

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


Ian D. Volner