

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

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POSTAL RATE COMMISSION
OFFICE OF THE DEPUTY CHIEF COUNSEL

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS CAMPBELL TO INTERROGATORIES OF KEYSpan
(KE/USPS-T39-1(f), 4(a,c,d,e,g))

The United States Postal Service hereby provides the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T39-1(f) and 4(a,c,d,e,g), filed on February 14, 2000. These interrogatories have been redirected from witness Mayo to witness Campbell for response.

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



Michael T. Tidwell

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February 29, 2000

**RESPONSE OF WITNESS CAMPBELL TO
INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS MAYO**

KE/USPS-T39-1.

On page 27 of your prepared testimony you indicate that the seventh criterion for establishing postal rate and fee levels is to offer simple and identifiable relationships.

- (f) Please confirm that in Docket No. MC99-2, USPS witness Schenk (USPS-T-3, p. 14) found that Postal Service personnel could weigh and count an average of 7,365.7 non-letter size BRM pieces per hour. If you cannot confirm, please explain.

RESPONSE:

- (f) Confirmed.

**RESPONSE OF WITNESS CAMPBELL TO
INTERROGATORIES OF KEYSpan ENERGY
REDIRECTED FROM WITNESS MAYO**

KE/USPS-T39-4.

On page 28 of your testimony you state that, for high volume QBRM recipients, "[o]nce the volume received reaches a level that requires a bill to be prepared essentially every day, further increases in volume have, at most, minimal effects on billing costs".


- (a) For high volume QBRM recipients, wouldn't it make sense to derive a billing cost under the assumption that a "bill is prepared essentially every day"?
- (c) Doesn't USPS witness Campbell assume "an average of 15 account transactions per accounting period" (USPS-T-29, p. 15, line 18) when deriving his monthly cost of \$232.13?
- (d) How many business days are there in on accounting period?
- (e) Did witness Campbell's derivation of the monthly billing cost assume that a bill would be prepared "essentially every day?"
- (g) If the derived billing cost assumes that a bill is prepared 15 times within an accounting period, and a high volume QBRM recipient receives mail "essentially every day", then wouldn't the derived billing cost understate the actual cost? Please explain your answer.

RESPONSE:

- (a) See my response to KE/USPS-T29-8 (b).
- (c) Yes.
- (d) There are 24 business days in an accounting period.
- (e) No.
- (g) No. See my response to KE/USPS-T29-8 (b).

DECLARATION

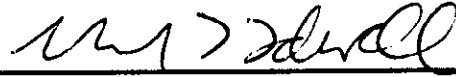
I, Chris F. Campbell, declare under penalty of perjury that the foregoing answers are true to the best of my knowledge, information and belief.


Chris F. Campbell

Dated: 2-29-00

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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