

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
TO INTERROGATORIES OF
THE AMERICAN LIBRARY ASSOCIATION
REDIRECTED FROM WITNESS KIEFER
(ALA/USPS-T37-4-6)

The United States Postal Service hereby provides its responses to the following interrogatories of the American Library Association: ALA/USPS-T37-4-6, filed on February 16, 2000, and redirected from witness Kiefer. The Postal Service filed objections to interrogatories ALA/USPS-T37-5 and 6 on February 28, although it expressed in that document that it intended to provide responses.

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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March 2, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE AMERICAN LIBRARY ASSOCIATION

ALA/USPS-T37-4. In the Postal Service's view, what characteristics of Library Rate mail cause its unit costs to exceed those of Special Standard Mail? Produce all studies, analyses and similar documents that support your answer.

RESPONSE

The Postal Service has not performed, nor is aware of the existence of, any studies or analyses that address this specific question definitively or in detail. But see generally USPS-LR-I-217. Nevertheless, the Postal Service is aware of some factors that may be responsible for the observed differences in the unit costs between Special Standard Mail (Media Mail) and Library Mail. The following summarizes the Postal Service's understanding of these factors.

Special Standard Mail is more commonly entered in large mailings than is Library Mail. These large mailings often contain mailpieces of relatively uniform size, are more commonly presorted, and are entered deeper into the mailstream more frequently than are Library Mail pieces. Special Standard Mail pieces are also, on average, lighter than Library Mail pieces. These features of Special Standard Mail might, on average, help make its unit costs lower than Library Mail.

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ALA/USPS-T-37-5. Please identify each characteristic of Library Rate mail that the Postal Service has studied, investigated or analyzed since Docket No. R97-1 as a possible cause of the relatively high unit costs attributed to the subclass by the Postal Service. Produce all documents relating to each such study, investigation or analysis.

RESPONSE

The Postal Service has not performed any definitive analyses of the subjects described in the interrogatory; however, information regarding trends in costs is provided in USPS-LR-I-217.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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ALA/USPS-T37-6. Please produce all memoranda, correspondence or other communications created by in-house or outside economists, cost analysts or consultants for Postal Service headquarters since July 1, 1998, concerning possible causes of the relatively rapid cost increases attributed to Library rate mail by the Postal Service's costing systems.

RESPONSE

See USPS-LR-I-217.

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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