

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

RECEIVED
MAR 2 4 37 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS MOELLER
(ANM/USPS-T35—4-6)**

The United States Postal Service hereby provides responses to the following interrogatories of Alliance of Nonprofit Mailers redirected from witness Moeller: ANM/USPS-T35—4-6, filed on February 16, 2000. The Postal Service filed objections to interrogatories ANM/USPS-5 and 6 on February 28, although it expressed in that document that it intended to provide responses.

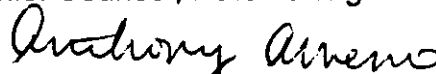
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
March 2, 2000

**RESPONSE OF U.S. POSTAL SERVICE TO
INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS MOELLER**

ANM/USPS-T35-4. In the Postal Service's view, what characteristics of nonprofit ECR Standard (A) mail have caused its unit costs to increase faster than those of commercial ECR Standard (A) mail from the base year in Docket No. R97-1 to the base year in Docket No. R2000-1 (FY 1998)? Produce all studies, analyses and similar documents that support your answer.

RESPONSE:

See USPS LR-I-217.

**RESPONSE OF U.S. POSTAL SERVICE TO
INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS MOELLER**

ANM/USPS-T35-5. Please identify each characteristic of nonprofit ECR Standard (A) mail that the Postal Service has studied, investigated or analyzed since Docket No. R97-1 as a possible cause of the relatively rapid cost increases attributed to the subclass by the Postal Service in this docket. Produce all documents relating to each such study, investigation or analysis.

RESPONSE:

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

**RESPONSE OF U.S. POSTAL SERVICE TO
INTERROGATORY OF ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS MOELLER**

ANM/USPS-T35-6. Please produce all memoranda, correspondence or other communications created by in-house or outside economists or cost analysts for Postal Service headquarters since July 1, 1998, concerning possible causes of the relatively rapid cost increases attributed to nonprofit ECR Standard (A) 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.



Anthony Alverro

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
March 2, 2000