

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

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH  
TO INTERROGATORIES OF  
THE ALLIANCE OF NONPROFIT MAILERS  
REDIRECTED FROM WITNESS RAMAGE  
(ANM/USPS-T2-5 and 7)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of the Alliance of Nonprofit Mailers: ANM/USPS-T2-5 and 7, filed on February 22, 2000, and redirected from witness Ramage.

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 7, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO  
ANM INTERROGATORIES  
(Redirected from Witness Ramage, USPS-T-2)**

**ANM/USPS-T2-5.** Please confirm that within MODS pools, mixed mail tallies are distributed to the classes and subclasses of mail in proportion the direct tallies. If you do not confirm, please explain how costs associated with mixed mail tallies are distributed.

**RESPONSE TO ANM/USPS-T2-5.**

Except for the MODS Platform cost pool and the empty container tallies, the statement that, within MODS pools, mixed tallies are distributed to the classes and subclasses of mail in proportion to the direct tallies, is not incorrect on general principles. The statement, however, needs to be qualified. This distribution is not performed in the aggregate but by item type and piece shape. Within a MODS cost pool, mixed tallies of an item type or piece shape are matched with direct mail tallies of the same item type or piece shape for the distribution.

For further details, please refer to:

- Section IIB of my testimony, in particular:
  - the introductory part on p.13 which defines "direct", "mixed" and "not-handling" tallies
  - Part, 3a, on p. 14, Distribution of Mixed Tallies to Subclasses
- Part II A of LR-I-106 on p.II.2, Overview of SAS Programs
- Part II B of LR-I-106, Description of SAS Programs, the sections on MOD1DIR, MOD2ITEM, MOD22ITM, MOD3CONT, p. II-41 – p. II-45
- The SAS program codes for MOD1DIR, MOD2ITEM, MOD22ITM and MOD3CONT contained in the diskette in LR-I-106

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO  
ANM INTERROGATORIES**

**(Redirected from Witness Ramage, USPS-T-2)**

**ANM/USPS-T2-7.** Please confirm that within MODS pools, "not handling" mail tallies are distributed to the classes and subclasses of mail in proportion the direct tallies. If you do not confirm, please explain how costs associated with not handling mail tallies are distributed.

**RESPONSE TO ANM/USPS-T2-7.**

Not confirmed. As a general principle, "not handling" tallies are distributed to the classes and subclasses of mail in proportion to the direct and distributed mixed tallies. The distribution is performed at the aggregate level. For non-allied cost pools, the distribution of the aggregated "not-handling" tallies is based on the aggregated direct and distributed mixed tallies within a MODS pool. For the allied cost pools, the distribution of the aggregated "not-handling" tallies within a MODS cost pool is based on the aggregated direct and distributed mixed tallies across all MODS allied and distribution cost pools.

For further details, please refer to:

- Section IIB of my testimony, in particular:  
the introductory part on p.13 which defines "direct", "mixed" and "not-handling" tallies  
Part, 3b, on p. 16, Distribution of Not-Handling Tallies to Subclasses
- Part II B of LR-I-106, Description of SAS Programs, the section on MOD4DIST, p.II-45
- The SAS program codes for MOD4DIST contained in the diskette in LR-I-106

**DECLARATION**


I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van-Ty-Smith

Dated: 3/7/00

## 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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