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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF
PITNEY BOWES TO USPS WITNESS FRONK
(PB/USPS-T-33-1)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Fronk: PB/USPS-T-33-1. 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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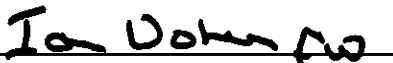
PB/USPS-T33-1. Your testimony at page 19, lines 2-4, states that “[c]onsistent with precedent, the discounts the Postal Service is proposing here use the same approaches as in Docket No. R97-1, that is, the bulk metered benchmark is used in conjunction with mail processing and delivery costs to measure costs avoided.”

- a. For (i) Base Year 1998 and (ii) Test Year 2001, what is the estimated unit cost of First-Class bulk metered mail (as defined in footnote 2 at page 18 of your testimony)?
- b. For (i) Base Year 1998 and (ii) Test Year 2001, what is the estimated unit cost of *all* First-Class single piece nonpresort mail (i.e, *including* bulk metered mail)?
- c. For (i) Base Year 1998 and (ii) Test Year 2001, what is the estimated unit cost of all First-Class single piece nonpresort *excluding* bulk metered mail?
- d. For base Year 1998, what was the volume of bulk metered mail (as defined in footnote 2 at page 18 of your testimony)?

PB/USPS-T33-2. For BY 1998 provide the unit cost for all subsets of nonpresort single piece First-Class Mail for which the Postal Service has estimates (e.g., for metered mail, QBRM, “dirty mail” etc.). Do not provide estimates for subsets that are homogeneous by shape, such as letters, flats, or parcels, or for non-standard pieces that weigh less than one ounce.

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