

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 DANIEL TO INTERROGATORY OF ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS REDIRECTED FROM WITNESS MOELLER
(AAPS/USPS-T35—4)**

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of the Association of Alternate Postal Systems redirected from witness Moeller: AAPS/USPS-T35—4, filed on February 23, 2000.


The 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



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Attorney

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March 8, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORY OF THE ASSOCIATION OF ALTERNATE POSTAL
SYSTEMS REDIRECTED FROM WITNESS MOELLER**

AAPS/USPS-T35-4. Please enumerate the cost functions that are significantly different in amount between processing one 8-ounce saturation piece entered at the DDU and two 4-ounce saturation pieces entered at the DDU.

RESPONSE:

The requested costs are not available at the requested rate category level; however, given the cost distribution methodologies underlying the study USPS LR-I-92, the cost for an 8-ounce ECR flat is approximately 11.9 cents, and the cost for two 4-ounce flats is approximately 15.8 cents, for a difference of 3.9 cents. Of the 3.9 cents, 0.74 cent is in mail processing, 0.03 cent is in window service, 1.14 cent is in city delivery in-office, 0.6 cent is in city delivery – street, 1.38 cent is in rural delivery. (The costs are from the 3-5 and 7-9 ounce increments, USPS-LR-I-92, Section 2, page 28.)

DECLARATION

I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SHARON DANIEL

Dated: 3/8/00

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.



Anthony Alverno

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