

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 NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS DANIEL
(NAA/USPS-T28-3)

The United States Postal Service hereby provides the response of witness Ramage to the following interrogatories of the Newspaper Association of America: NAA/USPS-T28-3, filed on March 1, 2000, and redirected from witness Daniel.

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

Kenneth N. Hollies / EHB
Kenneth N. Hollies

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAMAGE
TO INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA,
REDIRECTED FROM WITNESS DANIEL

NAA/USPS-T28-3. Please refer to Library Reference USPS-I-100, textual summary, at page 1-2.

- a. Please explain why data are collected by half-ounce weight increments up to four ounces, but only by full ounce increments between four and 16 ounces.
- b. Did you make any specific use in your testimony of the half-ounce increments between one and four ounces. If so, please explain where. If not, please explain why not.

RESPONSE:

a. Data are collected by half-ounce increments so that IOCS might be used to provide potentially useful weight-related cost insights beyond what could be derived from tallies which only record full ounces. Below four ounces, the half-ounce weight data are also used to edit and validate international observations, because the international LC mail has a half-ounce rate structure. Half-ounce data are not recorded beyond four ounces because in that weight range there is a relatively low frequency of IOCS observations for small weight increments.

b. Answered by witness Daniel.

DECLARATION

I, Mark F. Ramage, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Mark F. Ramage

Date: 3/15/2000

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.

Kenneth N. Hollies/EYS
Kenneth N. Hollies

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March 15, 2000