

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 DOUGLAS F. CARLSON
(DFC/USPS—50-51)**

The United States Postal Service hereby provides responses to the following interrogatories of Douglas F. Carlson: DFC/USPS—50-51, filed on March 7, 2000.

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



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March 21, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF DOUGLAS F. CARLSON**

DFC/USPS-50. Please refer to the response to DFC/USPS-T34-10 concerning Priority Mail flat-rate envelopes.

- a. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are larger than Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- b. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are smaller than Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- c. Please provide all evidence on the extent to which Priority Mail flat-rate envelopes weighing four to 16 ounces are the same size as Priority Mail flat-rate envelopes weighing one to three ounces. Please provide all available data.
- d. Please confirm that Priority Mail flats weighing one to three ounces are, in general, likely to be larger in size than Priority Mail flats weighing four to 16 ounces. If you do not confirm, please explain and provide available evidence.

RESPONSE:

- a-d. The Postal Service does not have information responsive to this request because it does not track the cube (size) of Priority Mail by ounce increment.

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DFC/USPS-51. Please refer to the response to DFC/USPS-T34-11. Please provide, in one-ounce increments up to 32 ounces and one-pound increments beyond, available data on air and water transportation costs for First-Class Mail and Priority Mail.

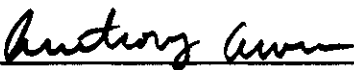
RESPONSE:

Total air and water costs for the Base Year (FY98) can be found in cost segment 14 of witness Meehan's Exhibit USPS-11A (\$513,659 for First-Class Mail and \$426,762 for Priority Mail). The total air and water costs for First-Class Mail and Priority Mail in the Test Year (FY01) can be found in cost segment 14 of witness Kashani's Exhibit USPS-14H (TYBR \$555,960 for First-Class Mail and \$462,426 for Priority Mail) and Exhibit USPS-14K (TYAR \$553,612 for First-Class Mail and \$425,968 for Priority Mail).

The Postal Service does not track pound-miles by ounce increment; therefore, transportation costs incurred by ounce increment cannot be calculated. An average cost per pound, or ounce, can be calculated by dividing the total costs of First-Class Mail or Priority Mail in the base year or test year by the total pounds of First-Class Mail and Priority Mail, respectively, and for average cost per ounce increment, dividing by 16 to calculate cost per ounce.

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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