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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
PITNEY BOWES
(PB/USPS-T33-2)

The United States Postal Service hereby provides its response to the following interrogatory of Pitney Bowes: PB/USPS-T33-2, filed on March 7, 2000).

The interrogatory has been redirected from witness Fronk to the Postal Service for response.

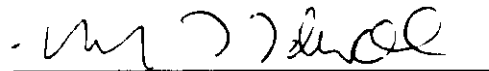
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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March 21, 2000

**RESPONSE OF THE U.S. POSTAL SERVICE TO
INTERROGATORIES OF PITNEY BOWES, INC.
REDIRECTED FROM WITNESS FRONK**

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.

Response:

All the cost estimates we have, which are subsets of nonpresort single piece First-Class Mail, are homogenous by shape. In the event any of these could be of use, see the following references. The testimony of witness Smith, USPS-T-21, Attachment 17 pages 1 and 2 contains First-Class single-piece mail processing unit costs by shape and First-Class single-piece metered letter mail processing unit costs. On QBRM, see the testimony of witness Campbell, USPS-T-29. On costs by ounce increment see the testimony of witness Daniel, USPS-T-28, at Table 1 and also USPS-LR-I-91.

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.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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