## 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 INTERROGATORY OF THE PARCEL SHIPPERS ASSOCIATION (PSA/USPS-4)

The United States Postal Service hereby provides its response to the following interrogatory of the Parcel Shippers Association: PSA/USPS-4, filed on March 8, 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

Scott L. Reiter

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## RESPONSE OF US POSTAL SERVICE TO INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION

**PSA/USPS-4** In response to PSA/USPS-3, the Postal Service responded that, even though the estimated changes and accrued costs for FY 2000 and FY 2001 are greater than the estimated changes in the CPI-W (by a cumulative amount of 2.7%, that is, 7.4% for FY 2000 and FY 2001 versus 4.7% for the CPI estimates for FY 2000 and 2001), the increases over the previous two rate cycles were 5 % below inflation.

- (a) Please explain why below-inflation rate increase over the previous two rate cycles are a justification for higher than inflation rate increases over a future rate cycle?
- (b) Is it not more the case that your below-inflation rate increases over the previous two rate cycles, which coincided with unprecedented postal surpluses, require that the Postal Service explain why it is departing from a pattern of below-inflation rate increases?

#### RESPONSE:

- (a) Please see the response to Postcom/USPS-4a and b.
- increases proposed in this filing. The revenue requirement is explained in USPS-T-9, the distribution of costs is explained in USPS-T-11 and USPS-T-14, and the design of rates is explained in USPS-T-32 and the testimonies of the rate design witnesses for the various classes of mail.

### **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.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 March 22, 2000