

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  
WITNESS DANIEL TO INTERROGATORY OF ASSOCIATION OF  
ALTERNATE POSTAL SYSTEMS  
(AAPS/USPS-T28—6)**

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of the Association of Alternate Postal Systems: AAPS/USPS-T28—6, filed on March 16, 2000.

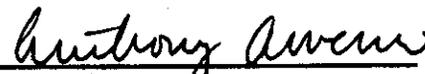
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anthony Alverno  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2997; Fax -6187  
March 30, 2000

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

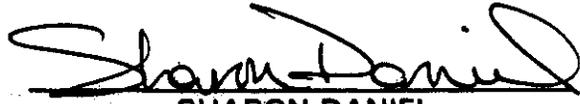
**AAPS/USPS-T28-6.** In response to AAPS/USPS-T35-4 (redirected from witness Moeller), you state that you cannot provide the requested information "at the requested rate category," which was saturation ECR, but you do provide information for ECR mail in general. For each of the cost segments identified in that response, please estimate whether the cost differential would be the same, smaller, or larger if you were to respond with respect only to saturation ECR mail, and explain why. (For example, if as you state the difference in city delivery in-office cost for two 4-ounce is 1.14 cents greater than for one 8-ounce piece, would that difference be the same, larger, or smaller for saturation mail, and why?)

**RESPONSE:**

Mail processing costs are lower for saturation mail as seen in Table 6 of USPS-T-28, as are rural and city in-office carrier costs according to USPS LR-I-95; however, a cost study of weight by ECR rate category has not been conducted. There are no data to suggest that the cost of window service or street delivery would be different for saturation ECR mail.

**DECLARATION**

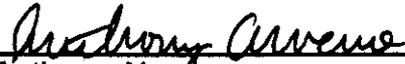
I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
SHARON DANIEL

Dated: 3-30-00

## 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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