

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

**UNITED STATES POSTAL SERVICE
NOTICE OF FILING MISSING ATTACHMENT TO RESPONSE OF WITNESS
DANIEL TO INTERROGATORY VP-CW/USPS-T28—24 [ERRATUM]**

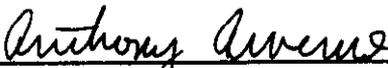
On March 23, the Postal Service filed witness Daniel's response to the following interrogatory of Val-Pak Direct Marketing Systems, Inc., Val-Pak Dealers' Association, Inc., and Carol Wright Promotions, Inc: VP-CW/USPS-T28—24. The response to that interrogatory references an attachment, which was inadvertently omitted from the copy of the response filed with the Commission. A copy of the response with the attachment is accordingly provided as an attachment to this notice. The Postal Service regrets any inconvenience occasioned by this oversight.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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April 3, 2000

**RESPONSE OF U.S. POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORIES OF VAL-PAK AND CAROL WRIGHT PROMOTIONS**

VP/USPS-T28-24. Please refer to USPS-LR-I-92, Section 2, page 12, where you have combined and reduced the weight increments for Standard A ECR Mail to a total of nine.

- a. For each of the nine weight increments shown on page 12, and for the portion of cost shown in the first three rows consisting of (i) all mail processing, (ii) window service, and (iii) delivery in-office (6.1), please provide the total number of tallies that you used to develop the cost estimates shown in the first three cost-estimate rows.
- b. For the total tallies which you provide for each ounce increment in response to preceding part a, please show the total broken down into (i) direct individual piece handling tallies, (ii) direct tallies handling more than one piece of mail (e.g., items or containers), (iii) mixed mail tallies, (iv) handling empty equipment tallies, (v) not handling tallies (break, etc.), and (vi) other (please specify).

RESPONSE:

- a. In the attached table(s), the unweighted and dollar weighted IOCS direct tallies for Standard Mail (A) ECR by weight increment are provided. Please note that mixed-mail and not-handling tallies are not uniquely associated with subclasses of mail and/or weight increments; therefore, it is my understanding that it is not possible to provide a meaningful count of tallies at the requested level of detail.
- b. In the attached table(s), the direct tallies have been separated into tallies in which the sampled employee was observed handling a single piece of mail and tallies in which the employee was observed handling multiple pieces of mail, item(s), or container(s).

Part a)
 BY98 IOCS Direct Tally Record Counts - Clerks and Mailhandlers Standard Mail (A) ECR
 Total Direct Tally Records

Cost Segment	Weight Increment (ounces)										Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13	No Wgt	
All Mail Processing (3.1)	1,248	485	292	654	76	38	20	16	115	36	2,979
Window Service (3.2)	3	1	1	0	0	0	0	0	0	0	5
City Carrier In-Office (6.1)	1,744	704	498	629	143	53	24	11	15	0	3,821

Part b)
 BY98 IOCS Direct Tally Counts - Clerks and Mailhandlers Standard Mail (A) ECR
 Direct Tally Record Count, Employee Handling Single Piece of Mail

Cost Segment	Weight Increment (ounces)										Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13	No Wgt	
All Mail Processing (3.1)	396	168	78	135	31	14	9	7	10	0	848
Window Service (3.2)	0	1	1	0	0	0	0	0	0	0	2
City Carrier In-Office (6.1)	1,401	554	373	464	101	39	17	7	12	0	2,968

Part b)
 BY98 IOCS Direct Tally Counts - Clerks and Mailhandlers Standard Mail (A) ECR
 Direct Tally Record Count, Employee Handling Multiple Pieces of Mail, Item, or Container

Cost Segment	Weight Increment (ounces)										Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13	No Wgt	
All Mail Processing (3.1)	852	317	214	519	45	24	11	9	105	36	2,131
Window Service (3.2)	3	0	0	0	0	0	0	0	0	0	3
City Carrier In-Office (6.1)	343	150	125	165	42	14	7	4	3	0	853

Part a)
BY98 IOCS Dollar Weighted Direct Tallies (F9250) - Clerks and Mailhandlers Standard Mail (A) ECR
Total Dollar Weighted Direct Tallies (\$000)

Cost Segment	Weight Increment (ounces)									No Wgt	Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13		
All Mail Processing (3.1)	59,469	31,962	17,293	29,008	5,554	3,105	1,652	985	2,373	1,610	153,011
Window Service (3.2)	278	48	62	0	0	0	0	0	0	0	388
City Carrier In-Office (6.1)	117,647	46,810	33,878	43,972	10,406	4,204	1,613	1,049	960	0	260,541

Part b)
BY98 IOCS Dollar Weighted Direct Tallies (F9250) - Clerks and Mailhandlers Standard Mail (A) ECR
Dollar Weighted Direct Tallies (\$000), Employee Handling Single Piece of Mail

Cost Segment	Weight Increment (ounces)									No Wgt	Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13		
All Mail Processing (3.1)	30,136	13,279	6,110	11,575	2,146	1,658	762	430	984	0	67,080
Window Service (3.2)	0	48	62	0	0	0	0	0	0	0	109
City Carrier In-Office (6.1)	94,278	36,176	24,915	31,853	7,489	3,274	1,130	771	780	0	200,667

Part b)
BY98 IOCS Dollar Weighted Direct Tallies (F9250) - Clerks and Mailhandlers Standard Mail (A) ECR
Dollar Weighted Direct Tallies (\$000), Employee Handling Multiple Pieces of Mail, Item, or Container

Cost Segment	Weight Increment (ounces)									No Wgt	Total
	0 - 1	1 - 2	2 - 3	3 - 5	5 - 7	7 - 9	9 - 11	11 - 13	> 13		
All Mail Processing (3.1)	29,333	18,683	11,183	17,433	3,408	1,446	890	554	1,389	1,610	85,931
Window Service (3.2)	278	0	0	0	0	0	0	0	0	0	278
City Carrier In-Office (6.1)	23,369	10,634	8,963	12,119	2,917	930	483	278	180	0	59,874

DECLARATION

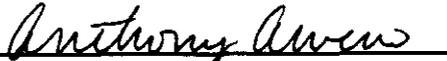
I, Sharon Daniel, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


SHARON DANIEL

Dated: 4/3/00

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 Alvergo

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