

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 BARON TO INTERROGATORIES OF
THE NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS KINGSLEY
(NAA/USPS-T10-21 and 22(d))

The United States Postal Service hereby provides the responses of witness Baron to the following interrogatories of the Newspaper Association of America: NAA/USPS-T10-21 and 22(d), filed on March 21, 2000. These interrogatories were redirected from witness Kingsley.

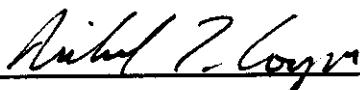
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
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April 4, 2000

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NAA/USPS-T10-21. Please consider two sets of twenty-four delivery points, each served by park and loop routes. Set (A) is served by a single cluster box; the other (Set B) consists of twenty-four distinct single family dwellings.

- a. Do you agree that access time for serving those delivery points is likely to be less on Set A than Set B?
- b. Is there any reason why coverage related load time would differ between Set A and Set B?
- c. Is there any reason why elemental load time would differ between Set A and Set B, assuming the same number and mix of mail is delivered on both routes?

RESPONSE:

- (a) A single cluster box containing twenty-four delivery points would probably require one or, at most, two carrier stops, where a stop is defined as a point where the carrier physically stops to delivery mail to one or more receptacles or to an individual. Twenty-four distinct single family dwellings would constitute twenty-four separate stops. Therefore, access time for serving Set B should be at least 12 times higher than access time for serving set A.
- (b) Coverage-related load time -- also known as fixed-time at a stop - is load time associated strictly with the activity of going to a stop; it is independent of the quantify and mix of mail loaded at that stop. For this reason, coverage-related load time always increases as actual stops increase. Therefore, coverage-related load time would be higher for set B than for set A.
- (c) Because elemental load time elasticities are less than 100% across all stop types (SDR, MDR, and BAM), load time per piece per stop declines as total pieces loaded per stop increase. Therefore, total elemental load time should be less in set A than in set B, because, given equal numbers and mixes of pieces across the two sets,

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INTERROGATORIES OF THE NEWSPAPER ASSOCIATION OF AMERICA,
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pieces per stop are much higher in set A than in set B. Moreover, since load times per piece are lower in set A than in set B, whereas total pieces are the same, total load time is also lower in set A.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BARON TO
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22(d). Would time devoted by a city carrier to handling a mis-sequenced piece at the delivery point be categorized as elemental load time, coverage-related load time, or some other category?

RESPONSE: This time would be categorized as elemental load time.

DECLARATION

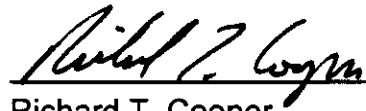
I, Donald M. Baron, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Donald M. Baron

Date: 4-4-00

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.


Richard T. Cooper

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