

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

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS CAMPBELL  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T29-13 THROUGH 17)

The United States Postal Service hereby provides the responses of witness Campbell to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T29-13 through 17, filed on March 21, 2000.

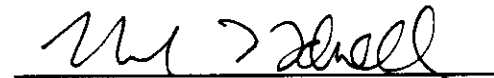
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

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April 4, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS CAMPBELL TO  
INTERROGATORY OF OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T29-13.**

How are window service stamp selling costs allocated to subclasses and/or rate categories of mail?

**RESPONSE:**

I am informed that the treatment of window service stamp selling costs can be found in the Cost Segment 3.2 B workpapers of witness Meehan (USPS-T-11).

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**OCA/USPS-T29-14.**

Please provide a description of each of the four types of Stamped Cards.

- a. single-cut
- b. single-sheet
- c. reply card
- d. banded

**RESPONSE:**

- a. Please see witness Mayo's testimony at USPS-T-39, page 150.
- b. See my response to part (a).
- c. See my response to part (a).
- d. Banded stamped cards are stamped card bundles with a band around them.

Banded stamped cards are typically sold in Postal vending machines in packs of five.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
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**OCA/USPS-T29-15.**

Your testimony at page 31 states: "Test year costs for Stamped Cards are based solely on contract prices negotiated with the U.S. Government Printing Office. These costs include materials, printing, and distribution." Please provide these costs. Please also provide the derivation of the unit costs in Table 4.

**RESPONSE:**

To my knowledge, the Postal Service does not maintain a breakdown of materials, printing, and distribution costs incurred by the U.S. Government Printing Office. The Postal Service agrees to pay the negotiated price to the Printing Office as with any other supplier.

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**OCA/USPS-T29-16.**

Please refer to your Workpaper III-4. Explain the use you make of the first three numbers labeled "CPI-U BY," "CPI-U TY," and "CPI Index".

**RESPONSE:**

"CPI-U BY" represents the Consumer Price Index – All Urban Consumers in the base year. "CPI-U TY" represents the Consumer Price Index – All Urban Consumers in the test year. The CPI index is the ratio of CPI-U TY / CPI-U BY.

To estimate the test year Philatelic Fulfillment Service Center (PFSC) customer service cost, I multiplied the CPI index by the base year PFSC customer service cost (see workpaper III-5, [6]). Footnote [9] in workpaper III-4 should read as follows:

[3] \* BY PFSC Customer Service Cost.

An erratum is forthcoming to correct the error.

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**OCA/USPS-T29-17.**

Please refer to your testimony at page 27. Explain what you mean by "coordination with the Library of Congress."

**RESPONSE:**

"Coordination with the Library of Congress" refers to the Postal Service forwarding periodicals eligibility applications to the Library of Congress (LOC) for review. If the LOC finds that the periodical meets their own criteria for value to the general public, then the LOC assigns a unique International Standard Serial Number (ISSN) to the periodical for purposes of cataloging the publication in the Library of Congress.

**DECLARATION**

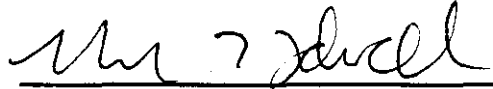
I, Chris F. Campbell, declare under penalty of perjury that the foregoing answers are true to the best of my knowledge, information and belief.

  
Chris F. Campbell

Dated: 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.

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

Michael T. Tidwell

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