

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 MEEHAN TO INTERROGATORIES OF
THE ASSOCIATION OF PRIORITY MAIL USERS, INC.
(APMU/USPS-T11-15-18)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of the Association of Priority Mail Users, Inc.: APMU/USPS-T11-15-18, filed on March 23, 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



Susan M. Duchek

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April 6, 2000

**Response of United States Postal Service Witness Meehan
to
Interrogatories of APMU**

APMU/USPS-T11-15 Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that overtime pay costs are used to calculate Cost Component 433 - All salaries plus other personnel costs from cost segments 1-13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

Response:

Confirmed. Overtime pay costs are part of salaries; therefore, it is proper to include them in the calculation of Component 433.

Response of United States Postal Service Witness Meehan
to
Interrogatories of APMU

APMU/USPS-T11-16 Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that the night differential costs are used to calculate Cost Component 433 - All salaries plus other personnel costs from cost segments 1-13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

Response:

Confirmed. Night differential pay costs are part of salaries; therefore, it is proper to include them in the calculation of Component 433.

**Response of United States Postal Service Witness Meehan
to
Interrogatories of APMU**

APMU/USPS-T11-17 Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that holiday pay costs are used to calculate Cost Component 433 - All salary plus other personnel costs from cost segments 1-13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm, please explain.

Response:

Confirmed. Holiday pay costs are part of salaries; therefore, it is proper to include them in the calculation of Component 433.

**Response of United States Postal Service Witness Meehan
to
Interrogatories of APMU**

APMU/USPS-T11-18 Please refer to your workpaper A-4 at pages 17 through 18.1, and confirm that salary costs of non-bargaining unit employees are used to calculate Cost Component 433 - All salaries plus other personnel costs from cost segments 1-13, 16, 18, and 19. If you do confirm, please explain why they are included. If you do not confirm please explain.

Response:

Confirmed. Salaries of non-bargaining unit employees are part of salaries; therefore, it is proper to include them in the calculation of Component 433.

DECLARATION

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

Karen B. Meehan

4-6-00

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.



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