

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
TO INTERROGATORY OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS RAMAGE
(TW/USPS-T2-3(c) and (d))

The United States Postal Service hereby provides the response of witness Van-Ty-Smith to the following interrogatories of Time Warner, Inc.: TW/USPS-T2-3(c) and (d), filed on April 6, 2000, and redirected from witness Ramage.

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



Susan M. Duchek

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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO
TW INTERROGATORIES
(Redirected from Witness Ramage, USPS-T-2)**

TW/USPS-T2-3. Please refer to your answers to TW/USPS-T17-14a, c and d, to TW/USPS-T17-15 and to TW/USPS-T2-1-2. Please confirm each of the following or, if not confirmed, please explain.

- c. All volume variable costs associated with tallies showing handling of empty pallets will be distributed to subclasses, under the current USPS methodology, based on the direct costs from direct tallies showing the handling of pallets.
- d. No volume variable costs associated with tallies showing handling of empty pallets will be distributed to subclasses, under the current USPS methodology, based on the direct costs from direct tallies showing the handling of "multiple items not in a container" or of postal paks.

RESPONSE TO TW/USPS-T2-3.

- c. Confirmed.
- d. Confirmed.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Ty Smith

Dated: 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.



Susan M. Duchek

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