

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 THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS MILLER
(OCA/USPS-T24-6(e))

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T24-6(e), filed on March 23, 2000. The interrogatory has been redirected from witness Miller to the Postal Service for response.

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



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April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS
MILLER**

OCA/USPS-T24-6 Please refer to Attachment USPS-T24B. (Please consult witnesses Kingsley or Pafford if necessary.)

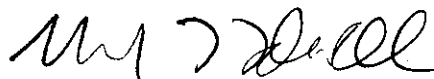
(e) Please explain how the estimates of under and over payment of postage provided in response to interrogatory OCA/USPS-69 are made.

RESPONSE:

(e) Estimates of under and over payment of postage provided in response to interrogatory OCA/USPS-69 were constructed from the Domestic RPW system, attested to by witness Pafford (USPS-T-4). Basically, sampled First-Class single-piece mail pieces whose revenue shown on the mail piece differed from the required postage were expanded to represent the population of all mail that was short paid or over paid. The table shown in response to OCA/USPS-69 shows the estimated revenue and volume for common short paid and over paid amounts, as well as the total estimate.

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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