

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 YACOBUCCI TO INTERROGATORY OF ASSOCIATION FOR
POSTAL COMMERCE
(PostCom/USPS-T25—9)**

The United States Postal Service hereby provides the response of witness Yacobucci to the following interrogatory of the Association for Postal Commerce: PostCom/USPS-T25—9, filed on April 5, 2000.

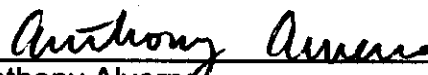
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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April 10, 2000

**RESPONSE OF U.S. POSTAL SERVICE WITNESS YACOBUCCI TO
INTERROGATORY OF ASSOCIATION FOR POSTAL COMMERCE**

PostCom/USPS-T25-9. Please refer to witness Kingsley's response to Postcom/USPS-T10-9 (f)-(i). In this response, witness Kingsley describes mail flows for letters with several types of address problems and indicates that the mail flow for flats with similar address problems would be similar although not exactly the same.

(a) For each mail flow described in witness Kingsley's response to Postcom/USPS-T10-9(f)-(g), please indicate whether the flats cost model contained in LR-I-90 explicitly models the mail flow or whether the model simply takes the cost resulting from the address problem into account through the use of a CRA adjustment factor.

RESPONSE:

- a. To the unknown extent that particular address problems affect the accept rates, then USPS LR-I-90 explicitly models that portion of address problems. Otherwise, USPS LR-I-90 accounts for any mail processing costs caused by address problems via the CRA cost adjustments. Please refer to my response to interrogatory PostCom/USPS-T25-7 for additional explanations concerning address quality.

DECLARATION

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

David Yacobucci

DAVID YACOBUCCI

Dated: 4/10/00

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.



Anthony Alverno

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