

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 XIE TO INTERROGATORIES OF  
THE COALITION OF RELIGIOUS PRESS ASSOCIATIONS  
(CRPA/USPS-T1-4-6)

The United States Postal Service hereby provides the responses of witness Xie to the following interrogatories of the Coalition of Religious Press Associations: CRPA/USPS-T1-4-6, filed on March 29, 2000.


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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

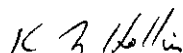
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Kenneth N. Hollies

**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.

  
\_\_\_\_\_  
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083 Fax -5402  
April 12, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**CRPA/USPS-T1-4**

Please refer to your responses to CRPA/USPS-T-1-1 and CRPA/USPS-T-1-3. In a normally distributed variable, such as is assumed when confidence levels are calculated for the data which are presented in your Table 3 (page 18 of your testimony),

(a) is it not the case that the Upper 95 % C.L. and the Lower 95% C.L. are equidistant from the mean?

(b) is it not the case in your Table 3 that statistically, the Lower 95% C.L. for 3C nonprofit ECR is approximately -\$415,000, even though such a number, being negative, could not be meaningful as a "cost" to the Postal Service? If not, why not?

**RESPONSE.**

(a) Yes. However, in situations where the lower bound results in a negative cost, I have truncated the confidence interval at 0.

(b) Yes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**CRPA/USPS-T1-5**

If you confirm T-1-4(b), and if the -415 were entered into Table 3 at the point above-referenced, then would the aggregate Lower 95% C.L. for BY98 Inter-SCF Highway Costs be approximately \$323,610,000? If not, why not?

**RESPONSE**

No. The intervals shown for aggregate costs in my testimony were unintended and are incorrect. TRACS distribution keys were applied to the aggregate cost. Hence, relative to TRACS sampling, the aggregate cost is a constant and is not subject to random variation. I intentionally summed costs across subclasses, but unintentionally summed over the lower and upper confidence intervals. The lower and upper confidence limits for total costs should be deleted from Tables 1-4 of my testimony.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS XIE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**CRPA/USPS-T-1-6**

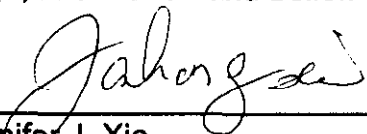
Which Postal Service witnesses used the C.L. ranges from your testimony in preparing their testimonies? (Please provide citations.)

**RESPONSE.**

To the best of my knowledge, no Postal Service witness relies on the confidence limits in my testimony. They are provided to satisfy the requirements of Rule 31 (k) (ii) (a).

DECLARATION

I, Jennifer J. Xie, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Jennifer J. Xie

Date: April 17, 2000