

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 THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS DAVIS  
(OCA/USPS-T30-1)

The United States Postal Service hereby provides its response to interrogatory OCA/USPS-T30-1, filed by the Office of the Consumer Advocate on April 3, 2000, and redirected from witness Davis.

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



David H. Rubin

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April 17, 2000

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

**OCA/USPS-T-30-1.** Please refer to your answer to OCA/USPS-T-39-4a.  
(redirected from witness Mayo).

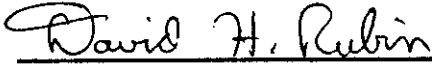
- a. You state that costs in C/S-3 and C/S-7 have increased due to methodological changes resulting in higher variability factors for insurance. You then refer to the testimony of witnesses Bozzo, Baron, and Van-Ty-Smith. Please provide specific references to the testimonies that detail these changes.
- b. Please describe the magnitude of these changes and their specific effects on the costs for insurance.

**RESPONSE:**

- a. The specific references are as follows:
  - USPS-T-12, pp. 31-37
  - USPS-T-15, pp. 132-135
  - USPS-T-17, pp. 18-19
- b. To see the effects of these changes on the costs for insurance, please compare C/S-3 and C/S-7 from BY 1998 costs (as presented in Exhibit USPS-11A, pp. 19-20, 27-28) with C/S-3 and C/S-7 from FY 1998 costs (as presented in USPS-LR-I-3, pp. 19-20, 27-28).

**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.

  
David H. Rubin  
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