BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

POSTAL RATE COMMILLION OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

NOTICE OF UNITED STATES POSTAL SERVICE CONCERNING ERRATA TO DIRECT TESTIMONY OF WITNESS MAYES (USPS-T-32) (ERRATUM)

The United States Postal Service hereby files this notice of errata to the testimony of witness Mayes. These changes conform the narrative portion of her testimony, USPS-T-32, the April 21, 2000, errata filed to correct Exhibits USPS-T-32A, USPS-32B, USPS-32C and USPS-32E.

On page 36, line 7 of USPS-T-32, "6.4 is changed to "6.5".

On page 38, line 19, the word "below" is changed to "above".

Corrected pages are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

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Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998 Fax –5402 April 25, 2000 However, it is lower than that of Enhanced Carrier Route, suggesting an
intermediate economic value of service. The availability of new ancillary
services, notably Delivery Confirmation and bulk insurance, to some Regular
Standard Mail (A) mailers is hoped to slightly increase the value of the service to
these users.

6 The 9.4 percent average rate increase is above the rate of inflation and 7 higher than the system average increase of 6.5 percent, resulting in a noticeable, but reasonable, impact on the users of Regular mail (criterion 4). However, the 8 9 rate increase experienced by Regular Standard Mail (A) in Docket No. R97-1 represented only a 1.2 percent increase in revenue per piece as reported by the 10 Commission.¹⁰ The fact that the Regular increase proposed in this case is 11 12 above the system-average increase, together with the 132.9 percent cost coverage over volume-variable costs, suggests that competitors are not unfairly 13 targeted by this increase. 14

The Regular subclass is somewhat more suited to demographic targeting of commercial messages and the Enhanced Carrier Route subclass is somewhat more suited to geographic targeting. For this reason, the availability of alternatives (criterion 5) is somewhat less for Regular, but a number of alternatives for demographically targeted advertising exist, including specialinterest magazines, cable television, and internet websites.

The mail within the Regular subclass all has a substantial degree of mailer preparation (criterion 6), with some of it being both prebarcoded and sorted to 5measured relative to volume-variable costs. For the test year, the application of
this markup results in a rate increase of 5.6 percent.

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3. Enhanced Carrier Route

The Postal Service is proposing a cost coverage of 208.8 percent over volume variable costs for the Enhanced Carrier Route (ECR) subclass, which results in a 4.9 percent average rate increase. This is somewhat below the system average increase, reflecting a desire to lower the very high cost coverage of this subclass.

9 In common with Regular, the intrinsic value of service (criterion 2) for ECR 10 is relatively low (criterion 2), since it lacks access to the collection system. 11 receives ground transportation, has no free forwarding and its delivery may be 12 deferred. The Postal Service may be able to accommodate mailer requests for delivery within a specific time frame, again requiring mailer preparation, 13 14 coordination, and planning. The regularity with which some of the high-density 15 and saturation rate category mailings are deposited may facilitate the delivery of 16 the mailpiece within the mailer's desired time frame. The price-elasticity of ECR 17 (-0.808) is higher in absolute value than that of Standard Mail (A) Regular or First-Class letters, indicating a relatively low economic value of service. 18 19 The average rate increase for ECR is slightly above the rate of inflation, 20 limiting its effect on mailers (criterion 4). Given the very high cost coverage of

the ECR subclass, this rate increase does not result in unfair competition for itscompetitors.

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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Michael T. Tidwell

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