

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
(OCA/USPS-133)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-133, filed on April 21, 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


Eric P. Koetting

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May 5, 2000

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OCA**

OCA/USPS-133. Please refer to Library Reference USPS-LR-I-179, provided in response to OCA/USPS-4.

- a. For PFY 1999, PFY 2000, PFY 2001, PFY 2002, PFY 2003, and PFY 2004, please confirm that the percentage change in volume for single-piece First-Class letters and flats from the prior year is -0.55%, -0.76%, -2.06%, -1.36%, -3.45%, and -5.13%, respectively. If you do not confirm, please explain and provide the correct percentage change in volume.
- b. For PFY 1999, PFY 2000, PFY 2001, PFY 2002, PFY 2003, and PFY 2004, please confirm that the percentage change in volume for workshared First-Class letters and flats from the prior year is 6.52%, 5.59%, 4.35%, 4.57%, 2.67%, and -1.38%, respectively. If you do not confirm, please explain and provide the correct percentage change in volume.
- c. Please confirm that the change (and resulting percentage change) in volume in each year for single-piece First-Class letters and flats in part a. of this interrogatory is a function of changes in rates and an assumed secular change in volume of single-piece First-Class letters and flats. If you do not confirm, please explain.
 - i. Please provide the price elasticity of demand associated with the changes in rates referred to in part c. of this interrogatory.
 - ii. Please provide the percentage change associated with the an assumed secular change in volume referred to in part c. of this interrogatory.
- d. Please confirm that the change (and resulting percentage change) in volume in each year for workshared First-Class letters and flats in part a. of this interrogatory is a function of changes in rates and an assumed secular change in volume of workshared First-Class letters and flats. If you do not confirm, please explain.
 - i. Please provide the price elasticity of demand associated with the changes in rates referred to in part c. of this interrogatory.
 - ii. Please provide the percentage change associated with the an assumed secular change in volume referred to in part c. of this interrogatory.

RESPONSE:

- a. Confirmed for the forecast supplied to GAO and reproduced in LR-I-179. The forecast underlying LR-I-179 is NOT the Test Year forecast

provided by Dr. Tolley in USPS-T-6 and Dr. Musgrave in USPS-T-8, and does not use the elasticities presented by Tom Thress in USPS-T-7.

b. Confirmed for the forecast supplied to GAO and reproduced in LR-I-179. The forecast underlying LR-I-179 is NOT the Test Year forecast provided by Dr. Tolley in USPS-T-6 and Dr. Musgrave in USPS-T-8, and does not use the elasticities presented by Tom Thress in USPS-T-7.

c. Confirmed that changes in volume are a function of those factors, among others. The single-piece own price elasticity used in the LR-I-179 forecast, from a model which also included a worksharing discount variable, was -0.281. As documented in USPS-T-7, II-B, pages 10-32, there are a large number of variables affecting volume. Price elasticity is one of many. The percentages directly attributable to the assumption about new electronic diversion over the base is found in LR-I-179, sheet Vol_div_pct, cell references b37:l59.

d. Confirmed that changes in volume are a function of those factors, among others. The workshared own price elasticity used in the LR-I-179 forecast, from a model which also included a worksharing discount variable, was -0.297. As documented in USPS-T-7, II-B, pages 10-32, there are a large number of variables affecting volume. Price elasticity is one of many. The percentages directly attributable to the assumption about new electronic diversion over the base is found in LR-I-179, sheet Vol_div_pct, cell references b37:l59.

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.

A handwritten signature in black ink, appearing to read "Eric P. Koetting", is written over a horizontal line.

Eric P. Koetting

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