

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 DAVID B. POPKIN
(DBP/USPS-196)

The United States Postal Service hereby provides its response to the following interrogatory of David B. Popkin: DBP/USPS-196, filed on April 25, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 12, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-196 Please refer to the response to DBP/USPS-62. [a] The response to subpart c did not indicate the number of articles delivered late. Please provide. [b] What is the total revenue received for all articles mailed in the March 27, 1999 to March 31, 2000 time frame utilized for your response to subparts a and c? [c] What is the total dollar amount of all refunds made during the March 27, 1999 to March 31, 2000 time frame? [d] Confirm that it would be appropriate to assume that the revenue received for the articles delivered by guaranteed time is reasonable close enough to 91.2% of the total revenue and that ratio of number of claims paid out compared to the number of articles delivered after the guarantee time is proportional to the corresponding revenue values. [e] If you are not able to confirm, provide your best estimate. [f] Confirm that your response to subpart f should also include those instances where the sender is not aware of the fact that the article was delivered after the guaranteed time as well as instances where the sender is not aware of the ability to obtain a refund or does not believe that it is worth making the effort to obtain a refund.

RESPONSE:

- (a) 5,520,033 pieces
- (b) \$1,055,104,000
- (c) \$1,317,605
- (d) It is confirmed that one may assume that the revenue received for the articles delivered by guaranteed time is reasonable close enough to 91.2% of the total revenue. The estimated revenue from the 5,520,033 pieces which were not delivered on time is \$75,624,452. It is not clear what is meant by "is proportional to the corresponding revenue values."
- (e) Not applicable.
- (f) It is not clear what the question is asking. The number of articles late includes all late articles, regardless of the sender's actions. The number of refunds is dependent upon initial action by the sender. Please see response to DBP/USPS-62(b).