

**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

**INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO OCA WITNESS CALLOW
(OCA-T6)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to OCA witness Callow: PostCom/OCA-T6-1-5. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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PostCom/OCA-T6-1. Should the parenthetical in the second line of note 3 at page 6 of your testimony read “(percentage by which the revenues exceed attributable cost)” with the emphasized word added?

PostCom/OCA-T6-2. Which of the measures of “relative institutional costs burden” (at T6, 6, line 14) do you believe most accurately reflective of the phenomenon to be measured and why?

PostCom/OCA-T6-3. In your comparisons of the relative institutional cost burdens of First-Class letter mail and Standard (A) regular mail, how do you account for the creation of the Standard (A) ECR subclass?

PostCom/OCA-T6-4. Your proposal for First-Class rates in part 1 (iii) of your testimony appears to affect only single-piece First-Class letters. Is this correct? Please confirm that your analysis of cost burdens in part 1 (i) is based upon all First-Class letter mail, not solely single-piece First-Class letter mail. If you do confirm, please explain why you believe that the remedy you propose is justified by the proof you advance for it. If you do not confirm, please explain.

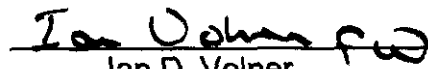
PostCom/OCA-T6-5. At OCA-T6, 38, lines 12-14 you say:

At the time of the third rate proceeding, when it would again be time to change the SPFC integer rate, the balance in the SPFC Reserve Account, positive or negative, would be taken into account in setting the new SPFC rate.

- (a) Please explain how the SPFC reserve account balance “would be taken into account”.
- (b) Do you envision any other changes in the factors taken into account at present in omnibus rate cases in setting SPFC rates?

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.


Ian D. Volner