

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
(OCA/USPS-136)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-136. The Postal Service objected to this interrogatory, and the OCA moved to compel a response on May 23, 2000. Without conceding the validity of its objection, the Postal Service has decided to respond to the interrogatory, rather than continue the motions practice.

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



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May 31, 2000

**RESPONSE OF US POSTAL SERVICE TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-136. Please refer to the response of the Postal Service to interrogatory OCA/USPS-55(c). Also, please refer to the website:

<http://www.directmag.com/content/newsline/2000/2000050303.htm>

The DirectNewsLine website reports that John Nolan, Deputy Postmaster General, in a May 2, 2000, speech before the Direct Marketing Association Government Affairs Conference 2000 in Washington, DC, "has organized a team that over the next few weeks will begin work planning *the 2003 and 2005 rate cases . . .*" (emphasis added).

- (a) Please provide a copy of Deputy Postmaster General Nolan's speech.
- (b) Please confirm that the DirectNewsLine report of the speech of Deputy Postmaster General Nolan with respect to planning for the "2003 and 2005 rate cases" is accurate. If you do not confirm, please explain.
- (c) Please confirm that it is the intent of Postal Service management to limit the period during which new postal rates will be in effect to approximately two years. If you do not confirm, please explain in detail the rationale for planning for the "2003 and 2005 rate cases."

RESPONSE:

- a.-b. There was no written version of the speech, and the Postal Service has no written transcription of it.
- c. Not confirmed. Rather, as stated in the response to OCA/USPS-55(c), a Postal Service objective is to extend the rate cycle for as long as possible in concert with the Board's policy on equity restoration. The "2003 and 2005 rate cases" was meant to refer to the next two rate cases, which may or may not end up being filed in those particular years. Management's intent is to stress the need to begin the planning process for future rate cases, not to set a target date for their filing.

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 "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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