

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE ASSOCIATION OF AMERICAN PUBLISHERS WITNESS SIWEK
(USPS/AAP-T2-1-4)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Association of American Publishers witness Siwek:

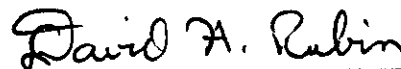
USPS/AAP-T2-1 to 4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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June 2, 2000

USPS/AAP-T2-1. Please refer to your testimony at page 18, lines 14-15, where you say "strata four's volume, and hence the total population volume, is measured with error. Instead of the true stratum proportions, the report used estimated weights that bias the estimate of the population mean."

- a. Please describe in detail your understanding of the nature of this measurement error.
- b. Please describe in detail how this measurement error generates bias in the estimate of the population mean.

USPS/AAP-T2-2. Please refer to your testimony at page 18, lines 23-26, where you say "the inflated means are the product of the 1999 sample mean times the 1998 inflation factor times the difference between the 1998 and 1999 inflation factors. This last term introduces a systematic bias that is not explicitly treated in the report." Please describe in detail the nature of the systematic bias introduced by this "last term."

USPS/AAP-T2-3. Please provide the workpapers supporting the rate schedule shown in your Attachment 4 (AAP-T-2, Attachment 4, Table 2, Page 1), similar to those provided in your Attachment 7 to support the proposed rates in your Attachment 6.

USPS/AAP-T2-4. Please refer to the following table:

RATE INCREASES FOR BPM MAIL CURRENTLY PAYING LOCAL RATES THAT WOULD BE ENTERED AT VARIOUS DSCF RATES

		Mr. Siwek's		Percentage	Percentage
	Current	Proposed	Mr. Siwek's	Change from	Change from
	Local	DSCF Rates	Attachment 4	Column (b) to	Column (b) to
Pounds	Rates	(Attachment 6)	DSCF Rates	Column (c)	Column (d)
(a)	(b)	(c)	(d)	(e)	(f)
1.5	0.582	0.709	0.829	21.8%	42.4%
2.0	0.596	0.722	0.846	21.1%	41.9%
2.5	0.610	0.735	0.864	20.5%	41.6%
3.0	0.624	0.748	0.881	19.9%	41.2%
3.5	0.638	0.761	0.899	19.3%	40.8%
4.0	0.652	0.774	0.916	18.7%	40.5%
4.5	0.666	0.787	0.934	18.2%	40.2%
5.0	0.680	0.800	0.951	17.6%	39.9%
6.0	0.708	0.826	0.986	16.7%	39.3%
7.0	0.736	0.852	1.021	15.8%	38.7%
8.0	0.764	0.878	1.056	14.9%	38.2%
9.0	0.792	0.904	1.091	14.1%	37.8%
10.0	0.820	0.930	1.126	13.4%	37.3%
11.0	0.848	0.956	1.161	12.7%	36.9%
12.0	0.876	0.982	1.196	12.1%	36.5%
13.0	0.904	1.008	1.231	11.5%	36.2%
14.0	0.932	1.034	1.266	10.9%	35.8%
15.0	0.960	1.060	1.301	10.4%	35.5%

- (a) Please confirm that the rates shown in column (b) of the table represent the current rates payable by Basic Presorted Bound Printed Matter entered at the Local rate for mail pieces having the weights shown in column (a). If you do not confirm, please explain.

- (b) Please confirm that the rates shown in column (c) of the table are the rates that Basic Presorted Bound Printed Matter mail pieces having the weights shown in column (a) would pay if your proposed DSCF rates were recommended by the Postal Rate Commission and implemented by the Postal Service Board of Governors. If you do not confirm, please explain.
- (c) Please confirm that the rates shown in column (d) of the table are the rates that Basic Presorted Bound Printed Matter mail pieces having the weights shown in column (a) would pay if the Attachment 4, Table 2, DSCF rates were recommended by the Postal Rate Commission and implemented by the Postal Service Board of Governors.
- (d) Please confirm that the percentage increases shown in column (e) of the table represent the percentage increases between the rates in column (b) and the rates in column (c).
- (e) Please confirm that the percentage increases shown in column (f) of the table represent the percentage increases between the rates in column (b) and the rates in column (d).

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.



David H. Rubin

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June 2, 2000