

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
PITNEY BOWES, INC. WITNESS HALDI
(USPS/PB-T2-1-2)

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 Pitney Bowes, Inc. witness Haldi: USPS/PB-T2-1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Mark W. Ro


475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3231 Fax -5402
June 6, 2000

USPS/PB-T2-1. Please confirm that the \$417,930,000 shown on line 14 of Table A-2 is the non-variable window service costs for the PRC version of the Base Year 1998 attributable cost. Tr. 21/9262. If you do not confirm, please indicate how the \$417,930,000 is derived.

USPS/PB-T2-2. Please refer to your Table A-1, line 22, showing \$20 million for Fiscal Year 1998 credit card fees. Please explain the rationale for using an implied variability of 100%, when the source referred to, PB/USPS-T-11-3 uses a variability of 59.8%.

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.



Mark W. Ro

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