# 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 WITNESS MAYO TO INTERROGATORY OF DAVID B. POPKIN REDIRECTED FROM THE POSTAL SERVICE (DBP/USPS-245)

The United States Postal Service hereby provides the response of witness Mayo to the following interrogatory of David B. Popkin: DBP/USPS–245, filed on May 31, 2000, and redirected from the Postal Service.

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

David H. Rubin.

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2986; Fax –6187 June 14, 2000

# RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO INTERROGATORY OF DAVID B. POPKIN REDIRECTED FROM THE POSTAL SERVICE

DBP/USPS-245 Please refer to your response to DBP/USPS-227. [a] The third sentence of your response to subpart a states that both the fee and postage are included in the claim amount. Please refer to DMM Section S010.3.2 and reanswer the question. [b] Please confirm that the FY 1998 claims that were for articles mailed in FY 1997 would be pretty much balanced by the articles mailed in FY 1998 that resulted in claims processed in FY 1999. [c] Please correct my original subpart d to \$1001-\$1100 and reanswer. [d] To compensate for the claims volume higher than expected for value levels \$100 above those value levels with a high number of transactions, confirm that placing the data into \$500 brackets ending at the value \$100 above the high number of transactions entry, such as \$1601-\$2100 would provide a more realistic picture of the data.

#### RESPONSE:

- a. The interrogatory does not have to be reanswered. "Applicable" fee refunds would include fees for ancillary services, such as return receipt service, but would not include the insurance fee.
- b. Not confirmed. The claims transactions that move from one year to the next are not specifically identified. I cannot guess with any accuracy as to whether or not the transactions would be balanced similarly from year to year.
- c. Confirmed that 471 is 4.8 percent of 9,824.
- d. Confirmed that grouping the data into \$500 brackets can mitigate the possibility that transactions and claims for the same mailing are in different brackets, but only if the entries with high numbers of transactions are included with the next higher increment.

# **DECLARATION**

I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

Dated: June 14, 2000

# **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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 June 14, 2000