

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTCOM ET AL. WITNESS GLICK
(USPS/Postcom-T1—1-2)

Pursuant to rules 25 and 26 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Postcom et al. witness Glick: USPS/Postcom-T1—1-2.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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June 15, 2000

USPS/Postcom-T1-1. Please see your testimony at Page 6, Table 2.

- a. Confirm that your proposed increase in the DBMC piece discount is 50%. If you cannot confirm, please provide your proposed percentage increase.
- b. Confirm that your proposed increase in the DSCF piece discount is 38%. If you cannot confirm, please provide your proposed percentage increase.
- c. Confirm that your proposed increase in the DDU piece discount is 38%. If you cannot confirm, please provide your proposed percentage increase.
- d. Confirm that your proposed increase in the DBMC pound discount is 44%. If you cannot confirm, please provide your proposed percentage increase.
- e. Confirm that your proposed increase in the DSCF pound discount is 40%. If you cannot confirm, please provide your proposed percentage increase.
- f. Confirm that your proposed increase in the DDU pound discount is 37%. If you cannot confirm, please provide your proposed percentage increase.
- g. If, in subsequent rate proceedings, the passthrough of 100 percent of the calculated cost avoidances used to support the destination entry discounts were to lead to reductions of 40% in the discounts, would you continue to advocate 100 percent passthrough? If not, what passthrough would you recommend?

USPS/Postcom-T1-2. Please see Attachment A of your testimony which includes POSTCOM proposed rates for Standard Mail (A).

- a. Please confirm that the POSTCOM proposed increase for non-destination entry 3/5-digit automation flats is 15.8 percent. If you cannot confirm, please provide the percentage increase you are proposing for non-destination entry 3/5-digit automation flats.
- b. Please confirm that your proposed increase for non-destination entry 3/5-digit automation flats exceeds the largest USPS proposed percentage increase in Standard Mail (A) Regular for pieces not subject to the Residual Shape Surcharge.
- c. Please confirm that the POSTCOM proposed increase for non-destination entry Saturation letters is 15.4%. If you cannot confirm, please provide the percentage increase you are proposing for non-destination entry Saturation letters.
- d. Please confirm that your proposed increase for non-destination entry Saturation letters exceeds the largest USPS proposed percentage increase in Standard Mail (A) ECR for pieces not subject to the Residual Shape Surcharge.

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.



Anthony Alverno

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