

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
APMU WITNESS HALDI
(USPS/APMU-T1-25-28)

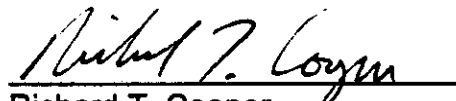
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to APMU witness Haldi: USPS/APMU-T1-25-28.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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Washington, D.C. 20260-1137
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June 15, 2000

USPS/APMU-T1-25. Refer to your Docket No. R97-1 testimony on behalf of Nashua Photo Inc, District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc (NDMS-T-2).

- a. Confirm that you proposed “an alternative procedure to project Test Year After Rates volumes and revenues by applying the estimated own-price elasticity to individual rate cells” [Docket No. R97-1, NDMS-T-2 at 3 lines 5-7]. If not confirmed, please explain fully.
- b. Confirm that you do not propose “to project Test Year After Rates volumes and revenues by applying the estimated own-price elasticity to individual rate cells” in your Docket No. R2000-1, APMU-T-1 testimony. If not confirmed, please explain fully.

USPS/APMU-T1-26. Refer to your APMU-T-1 testimony at page 72 where you state: “Offsetting this reduction would be revenue from any increase in Priority Mail volume as well as additional revenue from the enclosed pieces . . .”

- a. Please quantify the “increase in Priority Mail volume” that you would expect as a result of your proposed Priority Mail drop ship discount and provide all supporting analysis.
- b. Please quantify the additional revenue resulting from the “increase in Priority Mail volume” that you would expect as a result of your proposed Priority Mail drop ship discount and provide all supporting analysis.
- c. Please quantify any expected increase in the volume of mail pieces enclosed in Priority Mail drop shipments that you would expect as a result of your proposed Priority Mail drop ship discount and provide all supporting analysis.
- d. Please quantify any expected increase in the revenue from mail pieces enclosed in Priority Mail drop shipments that you would expect as a result of your proposed Priority Mail drop ship discount and provide all supporting analysis.

USPS/APMU-T1-27. Confirm that your proposal for Priority Mail drop shipment does not require any minimum volume of “enclosed pieces” in a Priority Mail drop shipped sack. If not confirmed, please explain fully.

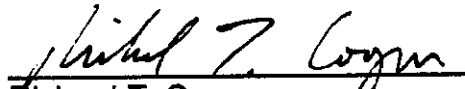
USPS/APMU-T1-28. Refer to your workpapers, APMU-LR-1, worksheet “DSCF”, Table II.

- a. Confirm that the source for the column titled “Projected Volumes at APMU Proposed Rates” is APMU-LR-1, worksheet “1-70 Lbs” Table 12. If not confirmed, please explain fully.

- b. Confirm that in APMU-LR-1, worksheet "1-70 Lbs" Table 12, the total number of Priority Mail pieces for weight increments from six to seventy pounds is 60,864,636 pieces. If not confirmed, please explain fully.**
- c. Confirm that in APMU-LR-1, worksheet "DSCF" Table II, the total number of Priority Mail pieces for weight increments from six to seventy pounds is 60,346,644 pieces. If not confirmed, please explain fully.**
- d. Please explain why the number of Priority Mail pieces for weight increments from six to seventy pounds differs in APMU-LR-1, worksheet "DSCF" Table II and APMU-LR-1, worksheet "1-70 Lbs" Table 12.**

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.


Richard T. Cooper

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