

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 POSTCOM ET AL. WITNESS GLICK  
(USPS/Postcom-T1—3-5)**


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—3-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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Anthony Alverno  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2997; Fax -6187  
June 16, 2000

USPS/PostCom-T1-3. On page 10 of your testimony, you state that you developed MPA-LR-2 with Time Warner witness Stralberg. Please refer to the mail processing unit costs on the worksheet entitled 'CRA Cost Pools' within MPA-LR-2.

- (a) Please confirm that these mail processing unit costs are identical to the mail processing costs on the worksheet entitled 'CRA Cost Pools' within USPS LR-1-90. If you do not confirm, please explain.
- (b) Please confirm that these mail processing unit costs do not reflect any changes due to proposed volume variability, cost reduction program, cost allocation, or cost distribution differences from the Postal Service's proposal. If you do not confirm, please explain.
- (c) Please confirm that, if these mail processing unit costs reflected any changes due to proposed volume variability, cost reduction program, cost allocation, or cost distribution differences from the Postal Service's proposal, then the proposed presort/automation cost differentials calculated from MPA-LR-2 would, in all likelihood, be different. If you do not confirm, please explain.

USPS/PostCom-T1-4. Please refer to your testimony at page 7, at lines 20-22, where you state that "as described by witness Lubenow (PostCom, et al.-T-3), the Postal Service has not quantified all of the cost savings that result from the higher address quality that result directly from automation requirements."

- (a) Please identify and describe each distinct component of cost savings that results from the higher address quality associated with automation requirements.
- (b) Please quantify each distinct cost savings as a percentage of total mail processing costs and provide the supporting data, reports, or analyses. Show all calculations and provide citations for all figures used in your analysis.

USPS/PostCom-T1-5. Please refer to your testimony at page 17, at 14-16, where you state that "accounting for costs caused by address problems via the

CRA cost adjustments essentially ignores them for the purpose of determining automation-related cost savings."

- (a) Please quantify the percentage of total mail processing costs caused by address problems and provide the supporting data, reports, or analyses. Show all calculations and provide citations for all figures.
- (b) Please identify each CRA mail processing cost pool that address problems affect.
- (c) For each CRA mail processing cost pool identified in subpart (b), please quantify the percentage of the cost pool's total mail processing cost that is caused by address problems and provide the supporting data, reports, and analyses. Show all calculations and provide citations for all figures.

## 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.

  
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Anthony Alverno

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Washington, D.C. 20260-1137  
(202) 268-2997; Fax -6187  
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