

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 OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS  
(USPS/OCA-T8-28)

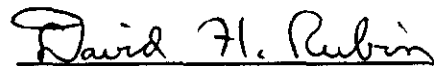
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to Office of the Consumer Advocate witness Collins: USPS/OCA-T8-28.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

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Washington, DC 20260-1137  
(202) 268-2986; Fax -6187  
June 30, 2000

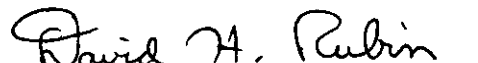
**USPS/OCA-T8-28.**

Please refer to your response to USPS/OCA-T8-10(b), where you state that "at least 43 of the 50 increments for insured mail have no empirical justification." Also, please refer to your response to USPS/OCA-T8-10(d), where you confirm that witness Mayo provided data on the number and amount of claims by value increment for insured mail. Finally, please refer to your response to USPS/OCA-T8-10(f), where you state that "there is no cost basis for the incremental fee", and you ask rhetorically how you could provide such a cost basis.

- (a) Please confirm that you did not try to use the claims data provided by witness Mayo to develop a cost basis for an incremental fee. If you do not confirm, please explain why.
- (b) Do you believe that the claims data provided by witness Mayo could not be used to provide empirical justification for incremental insurance fees for each of the insurance value increments? Please explain your response.

**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

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June 30, 2000