

UNITED STATES OF AMERICA  
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

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE TO  
INTERROGATORY OF UNITED STATES POSTAL SERVICE  
WITNESS: SHERYDA C. COLLINS (USPS/OCA-T8-28)  
(July 14, 2000)

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The Office of the Consumer Advocate hereby submits the answer of Sheryda C. Collins to an interrogatory of United States Postal Service, dated June 30, 2000. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE



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TED P. GERARDEN

Director

Office of the Consumer Advocate

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ANSWER OF OCA WITNESS SHERYDA C. COLLINS  
TO INTERROGATORY USPS/OCA-T8-28

USPS/OCA-T8-28. Please refer to your response to USPS/OCA-T8-I0 (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-I0(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.

RESPONSE TO USPS/OCA-T-8-28.

- a. Confirmed.
- b. I do not know. Please see witness Mayo's responses to OCA/USPS-T39-18-19 and my testimony at pages 13 and 14, including footnote 6.

DECLARATION

I, Sheryda C. Collins, declare under penalty of perjury that the answer to interrogatory USPS/OCA-T8-28 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed

July 14, 2000

Sheryda C. Collins

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
STEPHANIE S. WALLACE

Washington, D.C. 20268-0001  
July 14, 2000