

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

RECEIVED

JUL 28 11 11 AM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF
ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS PATELUNAS
(POSTCOM/USPS-ST44-1-2)

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the following interrogatories to USPS witness Patelunas: PostCom/USPS-ST44-1-2.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

July 28, 2000

PostCom/USPS-ST44-1. You testify that:

The test year labor contract assumption for those bargaining units that do not have contracts has also been re-evaluated and has been changed to reflect a total change in wage rates equal to the estimated change in the Employment Cost Index.

USPS-ST-44, 3 lines 6-9. Witness Tayman used "(ECI minus 1) for bargaining units that do not have contracts effective in the test year." USPS-9, 19 line 8. Please explain why you believe your approach is superior to that of Mr. Tayman with citation to any authority on which you rely for that conclusion. Supply copies of any cited material that is not readily publicly available.

PostCom/USPS-ST44-2. Please refer to Exhibit USPS-44Z and witness O'Tormey's response to MPA/USPS-ST42-10 where he estimated that reducing bundle breakage could reduce Standard A costs by \$14 million. Please confirm that the Postal Service's revised roll forward includes a \$14 million reduction in Standard A costs to reflect reduced bundle breakage in the Test Year.

- (a) If confirmed, where in the Exhibit is this amount reflected?
- (b) If not confirmed, how much cost savings from reduced bundle breakage does the roll forward include for Standard A?

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.



Ian D. Volner