

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS PATELUNAS
(TW/USPS-ST44-2 and 3)

The United States Postal Service hereby provides its responses to the following interrogatories of Time Warner, Inc.: TW/USPS-ST44-2 and 3, filed on July 14, 2000, and redirected from witness Patelunas.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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July 28, 2000

**Response of United States Postal Service to
Interrogatories of Time Warner, Inc.
(Redirected from witness Patelunas, USPS-ST-44)**

TW/USPS-ST44-2. Please confirm that development of BY99 volume variable costs per subclass and special service category in cost segments 3 and 6 depends on the use of IOCS data similar to the FY98 IOCS data contained in USPS LR-I-12. If not confirmed, please explain how the BY99 cost data were derived.

Response: Confirmed.

**Response of United States Postal Service to
Interrogatories of Time Warner, Inc.
(Redirected from witness Patelunas, USPS-ST-44)**

TW/USPS-ST44-3 Have the IOCS data needed to replicate BY99 cost data for cost segments 3 and 6 been included with the data provided in connection with your and witness Kay's supplemental testimony? If so, please describe where they can be found. If not, please provide them in a format similar to that used in LR-I-12. In either case, please answer the following:

a. Was the attribution and distribution of BY99 mail processing costs to subclasses and special services performed using the same SAS program used by witness Van-Ty-Smith to distribute the FY98 costs? If not, please explain all differences and provide the program that will replicate the Postal Service's BY99 costs.

b. Please provide the Postal Service's estimates of BY99 volume variable mail processing costs per MODS, NonMODS and BMC cost pool and per subclass and special service. If this information already has been filed, please explain where it can be found.

Response: The FY 1999 IOCS tallies are being provided as USPS-LR-I-439.

(a) and (b). The FY 99 volume-variable mail processing costs by MODS, Non-MODS and BMC cost pool, and by subclass and special service, are listed in the Excel table contained in the diskette filed in USPS-LR-I-437.

The SAS programs used to generate these costs are also provided in text format in USPS-LR-I-437.

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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