

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 INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS PATELUNAS
(OCA/USPS-ST44-8)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-ST44-8, filed on July 20, 2000, and redirected from witness Patelunas.

The 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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August 2, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE, REDIRECTED FROM WITNESS PATELUNAS

OCA/USPS-ST44-8. Please confirm that the Postal Service is not proposing to alter any of the proposed rates or cost coverages originally requested. If you are unable to confirm, please provide updated rate schedules as well as a revised cost coverage table.

Response:

The Postal Service has complied with the Postal Rate Commission's orders to update the cost rollforward model to reflect the FY 1999 actual costs, particularly as they relate to class and subclass of mail, and to provide revenue estimates, using the current and proposed rates tied to the billing determinants of the post-implementation period for the Docket No. R97-1 rates. As requested in POIR 16, the Postal Service provided in its response the cost coverages that result from combining the updated cost information and the POIR 16 revenue estimates. It is not the position of the Postal Service that such cost or revenue estimates, nor the cost coverages which derive therefrom represent a replacement of the Postal Service's case in chief. It is not anticipated that new rates or new cost coverage proposals will be proposed as a result of the Commission's orders to update the cost and revenue information in this case.

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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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