

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 AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF
PRESORT MAILERS REDIRECTED FROM WITNESS PATELUNAS
(ABA/USPS-ST44-1-28)

The United States Postal Service hereby provides its response to the following interrogatory of the American Bankers Association: ABA/USPS-ST44-28, filed on July 31, 2000, and redirected from witness Patelunas.

It should be noted that ABA/NAPM, in their interrogatory, characterize the Postal Service's response to Order No. 1294 as a "revised case." The Postal Service's interrogatory response should not be considered agreement with that characterization; the Postal Service considers its response to Order No. 1294 to consist of a requested update rather than a "revised case."

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 United States Postal Service to Interrogatories of
American Bankers Association and
National Association of Presort Mailers
(Redirected from witness Patelunas, USPS-ST-44)**

ABANAPM/USPS-ST44-28:

- a) Please confirm that as of July 28, 2000, you have not provided all of the piggyback data inputs in your revised case which would enable intervenors or the Commission to update your or their cost avoidance studies. If you cannot confirm, explain why not.
- b) Do you intend to submit these remaining piggyback inputs to the Commission?
- c) If your answer to b. is other than an unequivocal "No," will you submit these data inputs to the Commission prior to August 14th, the due date for filing by intervenors of testimony incorporating or rebutting the USPS July 7 and 21, 2000 revisions.

Response:

- a. Confirmed.
- b. No, both because of time and resource constraints, and because some of the models used to develop cost avoidances are not structured to be used with FY 1999 data.
- c. Not applicable.

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 black ink, appearing to read "Susan M. Duchek", written over a horizontal line.

Susan M. Duchek

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