

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 ASSOCIATION FOR POSTAL COMMERCE  
REDIRECTED FROM WITNESS PATELUNAS  
(POSTCOM/USPS-ST44-1)

The United States Postal Service hereby provides its response to the following interrogatory of the Association for Postal Commerce: POSTCOM/USPS-ST44-1, filed on July 28, 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



Susan M. Duchek

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August 16, 2000

**Response of United States Postal Service  
to Interrogatories of  
the Association for Postal Commerce  
(Redirected from witness Patelunas, USPS-ST-44)**

**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 affective 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.

**Response:**

Please refer to the testimony of witness Strasser, USPS-RT-1, pages 28 - 29.

**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 horizontal line.

Susan M. Duchek

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