

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS VAN-TY-SMITH TO INTERROGATORIES OF AOL TIME WARNER INC.
(AOL-TW/USPS-T13-1(c-e) and 2)

The United States Postal Service hereby provides the responses of witness Van-Ty-Smith to the following interrogatories of AOL Time Warner Inc.: AOL-TW/USPS-T13-1(c-e) and 2, filed on October 2, 2001. Interrogatories AOL-TW/USPS-T13-1(a-b) and 3 were redirected to the Postal Service.

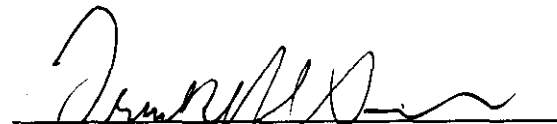
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Frank R. Heselton

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October 12, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
VAN-TY-SMITH TO INTERROGATORIES OF AOL-TW**

AOL-TW/USPS-T13-1. You refer to USPS LR-J-55 as fulfilling the same role as USPS LR-I-106 did in R2000-1. You also state that the purpose of your testimony is to summarize USPS LR-J-55. USPS-T13, at 1. Yet LR-J-55, both the hard copy and the electronic version posted on the Commission's web site, contains only a few listings of SAS code. On the other hand, USPS LR-J-82, the "PRC Version" of LR-J-55, contains much more information, including eight EXCEL files with various tables and an apparently more complete list of SAS code files.

- a. Please describe the contents of each of the Excel files in LR-J-82.
- b. Please indicate which, if any, of the EXCEL files in LR-J-82 also apply to EXCEL-J-55.
- c. Please provide LR-J-55 equivalents of each EXCEL file in LR-J-82.
- d. Please provide, in electronic spreadsheet and hard copy form, the equivalent information for this rate case of each of the tables in LR-I-106, to the extent they are not provided in response to parts b or c of this interrogatory.
- e. Does the narrative provided in LR-I-106 apply without any change to LR-J-55? If not, please provide an updated narrative that includes all changes in program logic, cost pool definition, etc. between the last rate case and this one.

Response to AOL-TW/USPS-T13-1.

- a. Redirected to the Postal Service.
- b. Redirected to the Postal Service.
- c. Please refer to tables in the pdf file for LR-J-55 on the PRC WEB site and to the Postal Service's response to AOL-TW/USPS-T13-1b.
- d. Please refer to tables in the pdf file for LR-J-55 on the PRC WEB site.
- e. No. The updated narrative for this rate case is included in the pdf file for LR-J-55 on the PRC WEB site.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
VAN-TY-SMITH TO INTERROGATORIES OF AOL-TW**

AOL-TW/USPS-T13-2 Please provide electronic spreadsheet (e.g., Excel) formats for the tables shown at the end of your testimony. If an electronic spreadsheet format already has been provided for some or all of these tables, please provide all relevant references.

Response to AOL-TW/USPS-T13-2

Please refer to the T13 Tables.xls file on the PRC WEB site.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van Ty Smith

Dated: October 12, 2001

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.



Frank R. Heselton

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