

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 SCHENK TO INTERROGATORY OF AOL TIME WARNER  
REDIRECTED FROM WITNESS MILLER  
(AOL-TW T24-6(f))

The United States Postal Service hereby provides the response of witness Schenk to the following interrogatory of AOL Time Warner: AOL-TW T-24-6(f), filed on October 16, 2001. Interrogatory AOL-TW T24-6(f) was redirected from witness Miller.

The subpart of 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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October 30, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK  
TO INTERROGATORY OF AOL TIME WARNER REDIRECTED FROM WITNESS  
MILLER**

**AOL-TW/USPS-T24-6(f).** Please confirm that, according to Table 1 in the spreadsheet in LR-J-100, the cost of the sack handling functions described in part d of this interrogatory is 2.85 cents per piece. If not confirmed, please provide an alternative estimate.

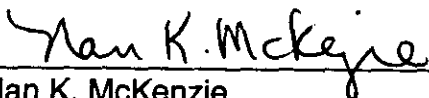
**RESPONSE:**

- f. Not confirmed. In addition to the costs associated with the opening of a sack, the removing of the sack's contents, and the empty sack handling (including sack storage and return to mailers), the unit cost of 2.85 cents per piece in Table 1 in LR-J-100.xls also includes other costs associated with sack handling at the destination facility. As shown in Table 1 in LR-J-100.xls, these other costs associated with sack handling at the destination facility include the cost of unloading the wheeled container that the sack is transported in from the van, the cost of the subsequent movement of that wheeled container from the dock to the bundle sort operation, and the empty wheeled container handling costs.

The test year unit cost associated with opening the sack, removing the sack's contents, and empty sack handling is 2.12 cents, which is calculated by adding the unit cost for "dump sacks at Bundle Sort" (1.26 cents) and "empty sack handling" (0.86 cents) from Table 1 in LR-J-100.xls.

**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.

  
\_\_\_\_\_  
Nan K. McKenzie

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