

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 PATELUNAS TO INTERROGATORY OF  
DIRECT MARKETING ASSOCIATION, INC. REDIRECTED  
FROM WITNESS TAYMAN  
(MPA/USPS-T6-13)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of Direct Marketing Association, Inc.: DMA/USPS-T6-13, filed on October 19, 2001, and redirected from witness Tayman.

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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Susan M. Duchek

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November 7, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS TO INTERROGATORIES OF  
DIRECT MARKING ASSOCIATION, INC.  
(REDIRECTED FROM WITNESS TAYMAN)**

**DMA/USPS-T6-13.** Please refer to Exhibit G of USPS-LR-J-49 where you identify \$350 million in FY 01, \$400 million in FY 02, and \$350 million in FY 03 of Other Program Breakthrough Productivity savings.

(a) Please describe all initiatives that the Postal Service includes in the Breakthrough Productivity Other Program.

(b) Please provide in an electronic spreadsheet format a disaggregation of the Other Program Breakthrough Productivity savings by fiscal year, cost segment, mail class, and mail subclass.

**Response:**

(a) The total Other Program Breakthrough Productivity savings shown in Exhibit G of USPS-LR-J-49 consist of the initiatives shown in Exhibits A – C of USPS-LR-J-49. There are also Cost Reduction Breakthrough Productivity savings and these are shown at pages 1 - 3. The individual initiatives by cost segment are:

**OTHER PROGRAMS**

<u>CS</u>	<u>Title</u>	<u>Exhibit A (FY2001)</u>	<u>Exhibit B (FY2002)</u>	<u>Exhibit C (FY2003)</u>
2	Supv.	0	69,000	50,000
3	Clk/MH.	172,500	123,695	110,443
6/7	City Carr.	77,500	99,932	89,225
10	Rural Car.	0	18,568	16,579
11	Maint.	0	9,650	8,616
12	MVS	0	28,154	25,138
16	Sup/Serv.	1,000	2,000	0
18	Admin.	99,063	48,638	49,663
<b>Total</b>		<b>350,063</b>	<b>399,637</b>	<b>349,664.</b>

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**Response continued:**

**COST REDUCTIONS**

<b><u>CS</u></b>	<b><u>Title</u></b>	<b><u>Ex E. Page1 (FY2001)</u></b>	<b><u>Ex. E Page 2 (FY2002)</u></b>	<b><u>Ex. E Page 3 (FY2003)</u></b>
14	Trans.	100,000	30,000	60,000
15	Bldg Occ.	40,000	42,000	40,000
Total		140,000	72,000	100,000

<b>Grand Total of Other Programs &amp; Cost Reductions</b>	<b>490,063</b>	<b>471,673</b>	<b>449,664</b>
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See also the responses of witness Tayman to DMA/USPS-T6-25, 30 and 32.

(b) Please refer to Attachment 1 that accompanies this response. The attachment shows where the requested information can be found in both hardcopy and electronic formats.

Cont Segment	Title	Format	USPS-LR-J-49 Exhibit A	USPS-LR-J-49 Exhibit B	USPS-LR-J-49 Exhibit C Before Rates	USPS-LR-J-49 Exhibit D After Rates
2	Supervisor	Hardcopy	NA	USPS-LR-J-171 p.5	USPS-T-12 Workpaper WP-E Table A pp 75-76 USPS-LR-J-6...Y03a1c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 75-76 USPS-LR-J-6...Y03a1c6.dcl
		Electronic	NA	USPS-LR-J-171 p.5		
3	CM/MT	Hardcopy	USPS-LR-J-171 p. 1	USPS-LR-J-171 p.6	USPS-LR-J-171 p.10	USPS-LR-J-171 p.13
		Electronic	USPS-LR-J-171 p. 1	USPS-LR-J-171 p.6	USPS-LR-J-171 p.10	USPS-LR-J-171 p.13
047	City Carrier	Hardcopy	USPS-LR-J-171 p. 2	USPS-LR-J-171 p. 7	USPS-LR-J-171 p.11	USPS-LR-J-171 p.14
		Electronic	USPS-LR-J-171 p. 2	USPS-LR-J-171 p. 7	USPS-LR-J-171 p.11	USPS-LR-J-171 p.14
10	Rural Carrier	Hardcopy	NA	USPS-T-12 Workpaper WP-C Table A pp 349-350 USPS-LR-J-6...Y0291c6.dcl	USPS-T-12 Workpaper WP-E Table A pp 299-300 USPS-LR-J-6...Y0301c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 299-300 USPS-LR-J-6...Y0301c6.dcl
		Electronic	NA	USPS-LR-J-6...Y0291c6.dcl	USPS-LR-J-6...Y0301c6.dcl	USPS-LR-J-6...Y0301c6.dcl
11	Maintenance	Hardcopy	NA	USPS-T-12 Workpaper WP-C Table A pp 377-378 USPS-LR-J-6...Y0291c6.dcl	USPS-T-12 Workpaper WP-E Table A pp 313-314 USPS-LR-J-6...Y0301c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 313-314 USPS-LR-J-6...Y0301c6.dcl
		Electronic	NA	USPS-LR-J-6...Y0291c6.dcl	USPS-LR-J-6...Y0301c6.dcl	USPS-LR-J-6...Y0301c6.dcl
12	MVS	Hardcopy	NA	USPS-T-12 Workpaper WP-C Table A pp 447-448 USPS-LR-J-6...Y0291c6.dcl	USPS-T-12 Workpaper WP-E Table A pp 381-382 USPS-LR-J-6...Y0301c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 381-382 USPS-LR-J-6...Y0301c6.dcl
		Electronic	NA	USPS-LR-J-6...Y0291c6.dcl	USPS-LR-J-6...Y0301c6.dcl	USPS-LR-J-6...Y0301c6.dcl
16	Suppl/Srv	Hardcopy	USPS-LR-J-171 p. 4	USPS-LR-J-171 p.9	NA	NA
		Electronic	USPS-LR-J-171 p. 4	USPS-LR-J-171 p.9	NA	NA
18	Admin	Hardcopy	USPS-T-12 Workpaper WP-A Table A pp 733-734 USPS-LR-J-6...Y0111c6.dcl	USPS-T-12 Workpaper WP-C Table A pp 745-746 USPS-LR-J-6...Y0291c6.dcl	USPS-T-12 Workpaper WP-E Table A pp 625-628 USPS-LR-J-6...Y0301c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 625-628 USPS-LR-J-6...Y0301c6.dcl
		Electronic	USPS-LR-J-6...Y0111c6.dcl	USPS-LR-J-6...Y0291c6.dcl	USPS-LR-J-6...Y0301c6.dcl	USPS-LR-J-6...Y0301c6.dcl
14	Transportation	Hardcopy	USPS-LR-J-171 p. 3	USPS-LR-J-171 p.6	USPS-LR-J-171 p.12	USPS-LR-J-171 p.15
		Electronic	USPS-LR-J-171 p. 3	USPS-LR-J-171 p.6	USPS-LR-J-171 p.12	USPS-LR-J-171 p.15
15	Blkg Occup.	Hardcopy	USPS-T-12 Workpaper WP-A Table A pp 733-734 USPS-LR-J-6...Y0111c6.dcl	USPS-T-12 Workpaper WP-C Table A pp 745-746 USPS-LR-J-6...Y0291c6.dcl	USPS-T-12 Workpaper WP-E Table A pp 625-628 USPS-LR-J-6...Y0301c6.dcl	USPS-T-12 Workpaper WP-G Table A pp 625-628 USPS-LR-J-6...Y0301c6.dcl
		Electronic	USPS-LR-J-6...Y0111c6.dcl	USPS-LR-J-6...Y0291c6.dcl	USPS-LR-J-6...Y0301c6.dcl	USPS-LR-J-6...Y0301c6.dcl

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 11/7/01

## 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.



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