

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SECKAR TO INTERROGATORY OF
TIME WARNER, INC.
REDIRECTED FROM WITNESS MODEN
(TW/USPS-T4-3(D))

The United States Postal Service hereby provides the response of witness Seckar to the following interrogatory of Time Warner, Inc.: TW/USPS-T4-3(d), filed on July 21, 1997, and redirected from witness Moden.

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

Kenneth N. Hollies

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August 4, 1997

U. S. POSTAL SERVICE WITNESS PAUL G. SECKAR RESPONSE TO
INTERROGATORIES OF TIME WARNER INC. REDIRECTED FROM
WITNESS MODEN (USPS-T-4)

TW/USPS-T4-3. You state at page 11, line 21, of your testimony:

"I have been advised that there are a couple of peculiar outputs from the cost models that do not reflect the aforementioned value of barcoding to operations. In both Periodicals and Standard (A) Nonprofit flats, the cost model outputs *do not appear to adequately reflect the inherent differences in processing efficiencies between barcoded and non-barcoded mail.* This circumstance is enigmatic, and we are determined to identify the factors that may have led to these results."

d. How much are these enigmatic conditions adding to the annual costs of processing (1) Periodicals; and (2) Standard (A) Nonprofit flats?

Response:

The enigma pertains to the fact that the cost models show cost differences with a sign that is the opposite of what would be expected given the known processing efficiencies. As indicated in the quoted testimony, the factors leading to the enigma have yet to be identified. I know of no way to quantify unidentified factors.

DECLARATION

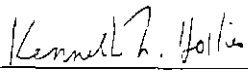
I, Paul G. Seckar, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Paul G. Seckar

Date: 8/4/97

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.



Kenneth N. Hollies

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