

BEFORE THE
POSTAL RATE COMMISSION RECEIVED
WASHINGTON, D.C. 20268-0001

SEP 5 4 55 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS TREWORGY
(OCA/USPS-T22-3, PARTS C-D)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T22-3, parts c-d, filed on August 22, 1997, and redirected from witness Treworgy.

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



David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
September 5, 1997

RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS TREWORGY

OCA/USPS-T22-3. Please refer to your direct testimony in Docket No. MC97-2 at 23, Table 7, where you list final total unit attributable costs at \$0.207541 for electronic DC and \$0.495545 for manual DC. In the earlier proceeding, the proposed rates for electronic and manual DC were \$0.25 and \$0.50, respectively. In your direct testimony in this docket, Table 7 at page 17, you show total volume variable unit costs as \$0.1486 and \$0.3349 respectively. In this proceeding, the proposed rates are \$0.25 and \$0.60, respectively.

- c. What policy decisions entered into the proposed pricing of electronic delivery confirmation relative to manual delivery confirmation in this docket? Explain fully.
- d. Please submit all documents relating to (c).


OCA/USPS-T22-3 Response.

c. The Standard (B) manual fee is 35 cents more than the Standard (B) electronic fee, while the manual costs are 33.41 cents more than the electronic costs. For discussion regarding application of ratemaking criteria in this instance, please see my testimony (USPS-T-40, pp. 16-22).

d. I am unaware of any documents relating to (c), other than my testimony in Docket No. R97-1 (USPS-T-40, pp. 16-22).

DECLARATION

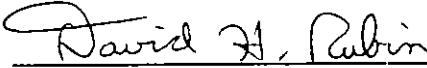
I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 9/5/17

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.



David H. Rubin

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