

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MILLER TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS ROBINSON
(MMA/USPS-T29-6(C) AND 13(A))

The United States Postal Service hereby provides the responses of witness Miller to the following interrogatories of MMA/USPS-T29-6(C) and 13(A), filed on October 24, 2001.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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November 9, 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.

Michael Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 9, 2001

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MILLER
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MMA/USPS-T29-6 On page 13 of your Direct Testimony you state that “[as] efforts to encourage worksharing are successful, avoided costs appear to decline.”

C. How does a practice by mailers, such as that described in Part B, cause USPS avoided costs to decline?

RESPONSE:

(C) Please see my response to MMA/USPS-T22-1(F) and (G).

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MMA/USPS-T29-13 Please refer to pages 15 and 25 of your Direct Testimony where you discuss the additional ounce rates for First-Class single piece and presorted mail. Please also refer to Library Reference USPS-LR-J-105 that derives costs separately for First-Class letters, flats and SPRs.

A. Do you agree that, for First-Class single piece mail weighing under 3 ounces, the most important cost driver is shape? Please explain your answer.

RESPONSE:

(A) Please see the response to OCA/USPS-2(b).