

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 KINGSLEY TO INTERROGATORY OF ASSOCIATION OF POSTAL
COMMERCE
(POSTCOM/USPS-T39-17)

The United States Postal Service hereby provides the response of witness
Kingsley to the following interrogatory of Association of Postal Commerce:
Postcom/USPS-T39-17, filed on November 6, 2001.

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

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
November 20, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORY OF ASSOCIATION OF POSTAL COMMERCE

POSTCOM/USPS-T39-17. In your answer to Postcom/USPS-T-39-12 (b) and (c) you referred to witness Kiefer's SWP2-1. Do you agree with his "Estimated Share of Presort Flats that would use clients barcode"?

- (a) If your answer is affirmative, why do you think that the correct percentage is "Eligible Presorted Flats Divided by Total Presorted bpm Flats"?
- (b) If you do not agree with Mr. Kiefer's estimation, what is yours?

Response:

I have no reason to question witness Kiefer's estimates and found no need to investigate the basis or development of the assumptions when putting together my testimony.

(a) – (b) The discount can provide significant rate savings with minimal marginal costs for the mailer that is most likely already barcoding Standard mail flats. Based on that alone, it appears to me to be reasonable to assume that customers will take advantage of the discount when eligible.

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.

Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 20, 2001