

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
ASSOCIATION FOR POSTAL COMMERCE
(POSTCOM/USPS-T12-1)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of Association for Postal Commerce: POSTCOM/USPS-T12-1, filed on November 13, 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:



Susan M. Duchek

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November 27, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS TO INTERROGATORY OF
ASSOCIATION FOR POSTAL COMMERCE**

POSTCOM/USPS-T12-1. In your answer to DMA/USPS-T6-51 (c), mislabeled (d) in your answer, you say that "any additional conceptual theoretical savings not considered in the formulation of field budgets will not be realized." Do you mean by this that if "savings opportunities for supervisors", the subject of the sentence preceding that quoted above, materialize in (or before) the test year the Postal Service will decline to take advantage of them?

Response:

No. The Postal Service tries to take advantage of all savings opportunities, including supervisors. The adjective "theoretical" in the quoted phrase is the main thrust of the argument concerning whether savings are in the budget or not. The quoted phrase is also found on page 2 of my R2000-1 rebuttal testimony, USPS-RT-4 and it is used on the context of arguing against including theoretical savings resulting from mechanistic calculations.

DECLARATION

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

Richard Patelunas

Dated: 11/27/01

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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