

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 SCHENK TO
INTERROGATORY OF THE NEWSPAPER ASSOCIATION OF AMERICA
(NAA/USPS-T43-10)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of the Newspaper Association of America: NAA/USPS-T43-10, filed on November 16, 2001.

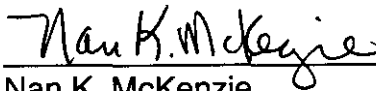
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Nan K. McKenzie

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November 30, 2001

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NAA/USPS-T43-10 Please refer to the "TY Summary" page of LR-J-117.xls.

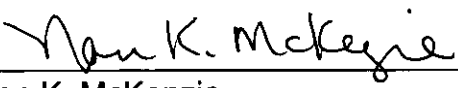
- a. For the ECR volumes, you cite LR-J-52. Please identify the location of these data in LR-J-52, or the correct citation, if not there.
- b. Please confirm that your ECR figures include NECR.
- c. Please confirm that the volumes and costs are TYBR figures.
- d. Please confirm that, after receiving the TY volumes and total TY costs for ECR from witnesses Smith and Patelunas, you performed all the calculations to determine costs by density tier for ECR mail.

RESPONSE:

- a. The base year ECR volumes in LR-J-117.xls come from USPS-LR-J-112, Tables 16 and 19. The test year to base year ratio used to develop test year volumes from base year volumes is provided in USPS-LR-J-53, SHP03U~1.xls, sheet 'Class' in cell D27.
- b. Confirmed.
- c. Confirmed.
- d. As described in part (a) above, the TY volumes are estimated from base year volumes obtained from witness Loetscher, and the test year to base year volume ratio obtained from witness Smith. Given these data and the total TY costs obtained from witness Patelunas, the calculations used to determine the carrier costs by density tier for ECR mail are contained in USPS-LR-J-117.

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.



Nan K. McKenzie

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