

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

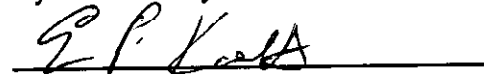
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS TOLLEY
TO VAL-PAK INTERROGATORIES VP/USPS -T7-1 - 3
(November 30, 2001)

The United States Postal Service hereby provides the response of witness Tolley to the following interrogatories of Val-Pak: VP/USPS-T7-1 - 3, filed on November 16, 2001. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5402
November 30, 2001

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY
TO INTERROGATORIES OF VAL-PAK**

VP/USPS-T7-1 Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$100 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (e.g., for presort categories), please provide a similar breakdown here.

RESPONSE:

In order to make an after-rates volume forecast, it is necessary to have a complete set of after-rates prices. The after-rates forecast that I have done is at the rates proposed by the Postal Service. Parties wishing to do other after-rates forecasts using alternative sets of proposed rates could do so themselves using the documentation materials I have provided. Since your question does not provide a complete set of specific after-rates prices, however, it would not be possible to run a forecast under the conditions you have hypothesized.

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY
TO INTERROGATORIES OF VAL-PAK**

VP/USPS-T7-2 Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$125 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (e.g., for presort categories), please provide a similar breakdown here.

RESPONSE:

Please see my response to VP/USPS-T7-1.

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY
TO INTERROGATORIES OF VAL-PAK**

VP/USPS-T7-3 Assume that witness Moeller (USPS-T-28) had reduced the revenue requirement for Standard ECR by \$150 million below the \$5,555.656 million After Rates revenue requirement shown in Exhibit USPS-28B.

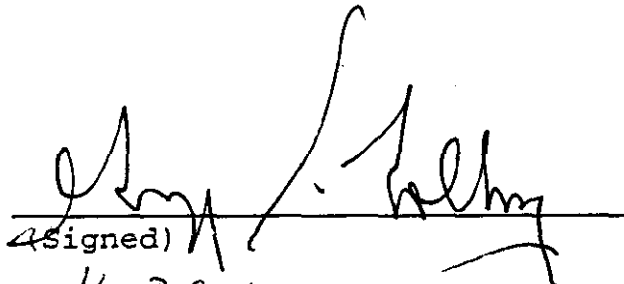
- a. What would have been the After Rates volume forecast for Standard ECR?
- b. If you provided any breakdowns of projected Standard ECR volumes below the subclass level (e.g., for presort categories), please provide a similar breakdown here.

RESPONSE:

Please see my response to VP/USPS-T7-1.

DECLARATION

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



(Signed)
11-29-01

(Date)

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 "E. P. Koetting", is written over a horizontal line.

Eric P. Koetting

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