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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 ROBINSON
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
(MMA/USPS-T29-22)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatory of Major Mailers Association: MMA/USPS-T29-22, filed on December 21, 2001.

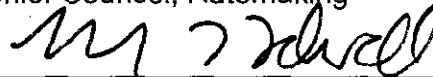
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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January 7, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF MAJOR MAILERS ASSOCIATION

MMA/USPS-T29-22 Please refer to your response to Interrogatory MMA/USPS-T29-19 and your response to Part J of Interrogatory MMA/USPS-T29-16. You were asked to confirm, in the most recent interrogatory, that had you proposed an average 7.4% percent for First-Class workshare mail (excluding fees) using the PRC cost methodology, the resulting implicit cost coverage for that mail would be 262. You failed to confirm this because you do not have a volume forecast or a roll-forward associated with a 7.4% increase for this category since your proposed increased was 9.2%.

- A. Please confirm that by working with unit revenues and costs that was suggested to you in Interrogatory MMA/USPS-T29-19, you still could not confirm that the resulting implicit cost coverage for First-Class workshare letters would be 262 because that methodology results in an "estimate" of the cost coverage, rather than the "actual" cost coverage.
- B. Please confirm that had you proposed a 7.4% for workshare letters, notwithstanding that it "is vague and difficult" to translate such an increase "into specific rate elements", that the resulting cost coverage using the PRC cost methodology is "estimated" to be 262. If you cannot confirm, please provide your best "estimate".

RESPONSE:

- A. To clarify, MMA/USPS-T29-19 did not ask me to estimate the implicit cost coverage using either of the two methods suggested by the Major Mailers Association. It asked me to explain why I did not use either of these methods to compute the requested cost coverage in response to MMA/USPS-T29-16. As I indicated in my response, I did not use either of these two methods because they would result in estimates, and therefore I could not confirm that the "resulting implicit cost coverage for First-Class workshare letters would be 262."

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Response to MMA/USPS-T29-22 (page 2 of 2)

B. Not confirmed. I am not proposing either a 7.4 percent increase in workshare First-Class Mail rates or any rates based on the Postal Rate Commission costing methodology; therefore, such an estimate is outside the scope of my testimony.

DECLARATION

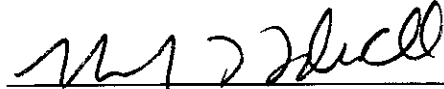
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


MAURA ROBINSON

Dated: January 7, 2002

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 "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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