

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 ROBINSON
TO INTERROGATORY OF AMERICAN BANKERS ASSOCIATION &
NATIONAL ASSOCIATION OF PRERSEORT MAILERS
(ABA&NAPM/USPS-T29-35)

The United States Postal Service hereby provides the response of witness Robinson to the following interrogatory of ABA&NAPM: ABA&NAPM/USPS-T29-35, filed on January 9, 2002.

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

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January 10, 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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 2, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS

ABA&NAPM/USPS-T29-35

Please see the response to ABA&NAPM/USPS-T22-3. Please confirm that the worksharing related savings estimates calculated in USPS LR-J-60 would increase to the figures found in Column 1 below if the aggregate delivery unit cost estimate for nonautomation presort letters were to be used as the proxy for Bulk Metered Mail (BMM) letters.

- a. Please see the response to ABA&NAPM/USPS-T22-4. Please confirm that the worksharing related savings estimates calculated in USPS LR-J-84 would increase to the figures found in Column 2 below if the aggregate delivery unit cost estimate for nonautomation presort letters were to be used as the proxy for Bulk Metered Mail (BMM) letters.
- b. Please confirm that column 3 in the table below shows the discounts resulting from the "Settlement" rates reflected in Attachment B, page 5 to the December 26, 2001 Postal Service Motion Submitting Revised Stipulation and Agreement.
- c. Please confirm that the figures presented in column (1) and (2) exceed the corresponding discounts in column (3).

FCLM Automated Rate Cost Avoidance/Discounts

	ABA&NAPM/USPS-T22-3 Cost Avoidance (1)	ABA&NAPM/USPS- T22-4 Cost Avoidance (2)	Proposed Settlement Discounts (3)
Auto Mixed Basic	6.950 cents	7.835 cents	6.1 cents
Auto AADC	7.825 cents	8.918 cents	6.9 cents
Auto 3D	8.142 cents	9.280 cents	7.8 cents
Auto 5D	9.278 cents	10.552 cents	9.2 cents

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Response to ABA&NAPM/USPS-T29-35 (page 2 of 2)

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. Confirmed.