

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CHARLES L. CRUM
TO AN INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS WILSON
(OCA/USPS-T4-3)

The United States Postal Service hereby provides the responses of witness Crum to the following interrogatory of Office of the Consumer Advocate: OCA/USPS-T4-3, filed on October 4, 2002. The interrogatory is redirected from witness Wilson.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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October 15, 2002

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TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS WILSON

OCA/USPS-T4-3. Please refer to your testimony at page 2, line16.

- (a) Please confirm that on a per piece basis, the fee for electronic address correction is less than the cost to physically return First-Class Mail that is UAA to the mailer at no charge. If you do not confirm, please explain.
- (b) Please confirm that on a per piece basis, the cost for electronic address correction is less than the cost to physically return First-Class Mail that is UAA to the mailer at no charge. If you do not confirm, please explain.
- (c) Please provide the net savings cost per piece to provide electronic address correction to the mailer instead of physically returning First-Class Mail that is UAA at no charge.

RESPONSE:

- (a) The fees charged for electronic Address Change Service are not part of my testimony, but it is my understanding that what you say is correct
- (b) Confirmed.
- (c) The estimated average net cost savings of providing electronic information versus providing physical return of a First-Class Mail piece is \$.2026. Please refer to page 5, line 17 of my testimony.

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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