

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 INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE,
REDIRECTED FROM WITNESS BIZZOTTO
(OCA/USPS-T1-2-3)

The United States Postal Service hereby provides the responses of witness Crum to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T1-2-3, filed on October 3, 2002. The interrogatories are redirected from witness Bizzotto.

Each 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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October 15, 2002

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REDIRECTED FROM WITNESS BIZZOTTO

OCA/USPS-T1-2. Please refer to your testimony at page 6, lines 5-8. Please confirm that the declining block discount feature of the NSA results in a negative contribution to institutional costs of \$4.9 million ($-\$6.7 \text{ million} + \1.8 million). If you do not confirm, please explain.

RESPONSE:

The declining block rate discount feature in isolation does result in a negative estimated test year contribution of \$4.889 million.

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OCA/USPS-T1-3. Please refer to your testimony at page 5, lines 17-18. Please confirm that the electronic address change feature of the NSA results in cost savings of \$13.1 million. If you do not confirm, please explain.

RESPONSE

The electronic address change feature in isolation does result in estimated test year cost savings of \$13.094 million.

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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