

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 CRUM TO  
INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T3-26-27)

The United States Postal Service hereby provides the responses of witness  
Wilson to the following interrogatories of Office of the Consumer Advocate:  
OCA/USPS-T3-26-27, filed on November 26, 2002.

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

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Nan K. McKenzie

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December 2, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-26.** Please refer to your response to Presiding Officer's Information Request (POIR) No. 2, Question 7. Please provide the electronic spreadsheets associated with the calculations in your response.

**RESPONSE:**

No spreadsheets were used in preparing that response. However, using the equations incorporated into the text, any party interested in creating a spreadsheet can readily do so from the information presented.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CHARLES L. CRUM  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-27.** Please refer to your response to OCA/USPS-T3-18(f). Please explain what you meant by “Partially confirm.” Please explain why \$0.0997 should not be used as “an estimate of the additional costs of ACS notification above the costs of standard forwarding.”

**RESPONSE:**

Table 5.2.2 of USPS/LR-J-69 presents a cost estimate of \$0.0997 for a combination of keying on mechanized and non-mechanized terminals. Capital One returns are comprised mostly of letters. Letters are processed on mechanized terminals. The cost estimate of keying on mechanized terminals is \$0.0660.

## 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.

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Nan K. McKenzie

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