

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO
INTERROGATORY OF AMERICAN BUSINESS PRESS REDIRECTED FROM
WITNESS BRADLEY (USPS-T-13)
(ABP/USPS-T13-2)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of American Business Press: ABP/USPS-T13-2, filed on September 17, 1997 and redirected from witness Bradley (USPS-T-13).

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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September 30, 1997

Response of United States Postal Service Witness Patelunas
to Interrogatories of
American Business Press
(Redirected from Witness Bradley, USPS-T13)

ABP/USPS-T13-2

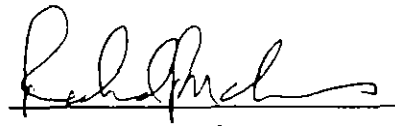
Please refer to p. 4 of your testimony where you state that the USPS system of cost accounts for purchased highway transportation segregates accrued costs by type of transportation. For each separate account to which you refer on p. 4 (E.G. inter-BMC), please provide the purchased highway transportation cost for regular-rate periodicals in BY 1996, FY 1997 and 1998 (e.g. as projected by Witness Patelunas, USPS-T-15, Exhibit USPS-15B, Exhibit USPS-15H).

ABP/USPS-T13-2 Response:

In BY 1996, accrued costs by account are grouped by type of transportation into cost pools. Volume variabilities and distribution keys are then applied to these cost pools to calculate costs by class and subclass of mail. These distributed cost pools are the components in the Postal Service's cost model and it is these components that are rolled-forward from the base year to the test year. As such, class and subclass of mail detail is only available once the volume variabilities and distribution keys have been applied to the cost pools; class and subclass of mail detail is not available at the account level.

DECLARATION


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

A handwritten signature in cursive script, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 9/30/97

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.



Susan M. Duchek

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