

ORIGINAL

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

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ROTHSCHILD TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T4-36)

The United States Postal Service hereby provides the responses of witness Rothschild to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-36, filed on October 28, 1998.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

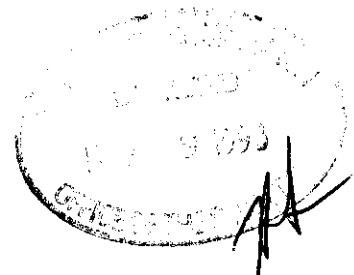
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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November 16, 1998



**Response of Postal Service Witness Rothschild
to OCA Interrogatories**

OCA/USPS-T4-36. Please refer to NetPost's Commercial Prices, at the 25 percent contribution margin, shown on the rate cards that appear at the end of Attachment E in USPS-LR-2/MC98-1.

- a. Please confirm that the prices in the rate card entitled "Next-Day Delivery" reflect the rates of postage for First Class Mail. If you do not confirm, please explain.
- b. Please confirm that the prices in the rate card entitled "Standard (Two-To Five-Day) Delivery" reflect the rates of postage for Standard (A) mail. If you do not confirm, please explain.
- c. Please confirm that the prices in the rate cards entitled "Next-Day Delivery" and "Standard (Two-To Five-Day) Delivery" reflect the rates of postage that are to be effective on January 10, 1999. If you do not confirm, please explain.
- d. For the "Next-Day Delivery" and "Standard (Two-To Five-Day) Delivery" rate cards, please provide the amount of postage assumed in the prices shown in each cell.

RESPONSE:

a,b,c. All prices in each rate card were the sum of a postage and production cost given to us by the Postal Service.

d. The following postage rates were assumed for both the *simplex and duplex next-day delivery* commercial prices at the 25% contribution margin.

**First Class Postage (Automation Presort, 3-Digit
Letter-Size, 3/5 Flat-Size)**

1-2 pages	\$0.254	\$0.254	\$0.254	\$0.254	\$0.500	\$0.500
1-4 pages	\$0.254	\$0.254	\$0.254	\$0.254	\$0.684	\$0.684
5-6 pages	0.484	0.484	0.684	0.684	0.914	0.914
7-10 pages	0.684	0.684	0.914	0.914	1.144	1.144
11-15 pages	0.914	0.914	1.144	1.144	1.374	1.374
16-20 pages	1.144	1.144	1.374	1.374	1.604	1.604
21-25 pages	1.374	1.374	1.604	1.604	1.834	1.834
26-30 pages	1.604	1.604	1.834	1.834	2.064	2.064
31-35 pages	1.834	1.834	2.064	2.064	2.294	2.294
36-40 pages	2.064	2.064	2.294	2.294	2.524	2.524
41-45 pages	2.294	2.294	2.524	2.524	2.89	2.89
46-48 pages	2.524	2.524	2.89	2.89	2.89	2.89

**Response of Postal Service Witness Rothschild
to OCA Interrogatories**

The following postage rates were assumed for *duplex standard delivery* commercial prices at the 25% contribution margin.

Standard Rate Duplex					
Pages	Ltr-Size	Non-Ltr	Pages	Ltr-Size	Non-Ltr
1	0.162		25	-	\$0.2422
2	0.162		26	-	\$0.2500
3	0.162		27	-	\$0.2577
4	0.162		28	-	\$0.2654
5	0.162		29	-	\$0.2731
6	0.162		30	-	\$0.2809
7	-	\$0.1760	31	-	\$0.2886
8	-	\$0.1760	32	-	\$0.2963
9	-	\$0.1760	33	-	\$0.3041
10	-	\$0.1760	34	-	\$0.3118
11	-	\$0.1760	35	-	\$0.3195
12	-	\$0.1760	36	-	\$0.3272
13	-	\$0.1760	37	-	\$0.3350
14	-	\$0.1760	38	-	\$0.3427
15	-	\$0.1760	39	-	\$0.3504
16	-	\$0.1760	40	-	\$0.3582
17	-	\$0.1804	41	-	\$0.3659
18	-	\$0.1881	42	-	\$0.3736
19	-	\$0.1958	43	-	\$0.3813
20	-	\$0.2036	44	-	\$0.3891
21	-	\$0.2113	45	-	\$0.3968
22	-	\$0.2190	46	-	\$0.4045
23	-	\$0.2268	47	-	\$0.4123
24	-	\$0.2345	48	-	\$0.4200

**Response of Postal Service Witness Rothschild
to OCA Interrogatories**

The following postage rates were assumed for *simplex standard delivery* commercial prices at the 25% contribution margin.

Standard Rate Simplex					
Pages	Ltr-Size	Non-Ltr	Pages	Ltr-Size	Non-Ltr
1	0.162		25	-	\$0.2422
2	0.162		26	-	\$0.2500
3	0.162		27	-	\$0.2577
4	0.162		28	-	\$0.2654
5	0.162		29	-	\$0.2731
6	0.162		30	-	\$0.2809
7	-	\$0.1760	31	-	\$0.2886
8	-	\$0.1760	32	-	\$0.2963
9	-	\$0.1760	33	-	\$0.3041
10	-	\$0.1760	34	-	\$0.3118
11	-	\$0.1760	35	-	\$0.3195
12	-	\$0.1760	36	-	\$0.3272
13	-	\$0.1760	37	-	\$0.3350
14	-	\$0.1760	38	-	\$0.3427
15	-	\$0.1760	39	-	\$0.3504
16	-	\$0.1760	40	-	\$0.3582
17	-	\$0.1804	41	-	\$0.3659
18	-	\$0.1881	42	-	\$0.3736
19	-	\$0.1958	43	-	\$0.3813
20	-	\$0.2036	44	-	\$0.3891
21	-	\$0.2113	45	-	\$0.3968
22	-	\$0.2190	46	-	\$0.4045
23	-	\$0.2268	47	-	\$0.4123
24	-	\$0.2345	48	-	\$0.4200

DECLARATION

I, Beth B. Rothschild, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Beth B. Rothschild

Dated: 11/16/98

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written in a cursive style.

Scott L. Reiter

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