

ORIGINAL

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS SECKAR TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS ROTHSCHILD  
(OCA/USPS-T4-39-40)

The United States Postal Service hereby provides the responses of witness Seckar to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-39-40, filed on November 2, 1998, and redirected from witness Rothschild.

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

David H. Rubin  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
November 12, 1998



RESPONSE OF POSTAL SERVICE WITNESS SECKAR TO INTERROGATORY  
OF OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS ROTHSCHILD

**OCA/USPS-T4-39.** Please refer to NetPost's Commercial Prices, at the 25 percent contribution margin, for "Next-Day Delivery" shown on the rate cards that appear at the end of Attachment E in USPS-LR-2/MC98-1.

- a. Please confirm that the total volume is 91,744,857 (295,665,025 \* .3103). If you do not confirm, please explain and provide the correct figure.
- b. Please confirm that volume for Simplex pieces is 44,083,404 (91,744,857 \* .4805). If you do not confirm, please explain and provide the correct figure.
- c. Please confirm that volume for Duplex pieces is 47,661,453 (91,744,857 \* .5195). If you do not confirm, please explain and provide the correct figure.
- d. Please confirm that the volume for 1-2 page Simplex pieces is 29,895,946 (44,083,404 \* (200,490,454 / 295,635,459)). If you do not confirm, please explain and provide the correct figure.
- e. For 1-2 page Simplex pieces, please provide the volume associated with the price per piece of \$0.36 for 8.5x11 and 8.5x14, respectively, for Black & White, and \$0.46 for 8.5x11 and 8.5x14, respectively, for Spot color.
- f. Please confirm that the volume for "More than 15 pages," Simplex pieces is 3,108,191 ((44,083,404 \* (20,844,384 / 295,635,459))). If you do not confirm, please explain and provide the correct figure.
- g. For "More than 15 pages" Simplex pieces, please provide the volume for 8.5x11, 8.5x14 and 11x17 for Black & White, and for 8.5x11, 8.5x14 and 11x17 for Spot color.
- h. Please confirm that the volume for "More than 15 pages," Duplex pieces is 3,360,469 ((47,661,453 \* (20,844,384 / 295,635,459))). If you do not confirm, please explain and provide the correct figure.
- i. For "More than 15 pages" Duplex pieces, please provide the volume for 8.5x11, 8.5x14 and 11x17 for Black & White, and for 8.5x11, 8.5x14 and 11x17 for Spot color.

**RESPONSE:**

- a. Confirmed. Please see LR-2/MC98-1, Section E, Table 15.
- b. Confirmed, for purposes of my cost analysis. This volume was derived from the results presented in USPS-LR-2.
- c. Confirmed, for purposes of my cost analysis. This volume was derived from the results presented in USPS-LR-2.

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- d. Not confirmed. The volume derived from the results presented in USPS-LR-2, for use in my cost analysis, for 1-2 page Simplex pieces is 29,892,956 ( $44,083,404 * (200,490,454 / 295,665,025)$ ).
- e. I did not calculate these volumes for use in my testimony. However, they could be calculated using the volumes and distributional percentages found in Table 4 of Exhibit A of my testimony or USPS-LR-2/MC98-1, Section E, Table 15. For example, 1-2 page simplex pieces that are black and white on 8.5x11 paper could be calculated by applying the distributional percentages for simplex pieces, black and white pieces, and 8.5x11 pieces to the 1-2 page pieces volume. This method would similarly provide the calculation of 1-2 page simplex pieces that are black and white on 8.5x14 paper and 1-2 page simplex pieces that are spot color on 8.5x11/14 paper.
- f. Not confirmed. The volume derived from the results presented in USPS-LR-2, for use in my cost analysis, for "More than 15 pages," Simplex pieces is 3,107,880 ( $44,083,404 * (20,844,384 / 295,665,025)$ ).
- g. The following volumes were derived from the results presented in USPS-LR-2, for use in my cost analysis.

8.5x11 Black & White	1,361,243	$(3,107,880 * 55.52\% * 78.89\%)$
8.5x14 Black & White	152,016	$(3,107,880 * 55.52\% * 8.81\%)$
11x17 Black & White	212,408	$(3,107,880 * 55.52\% * 12.31\%)$
8.5x11 Spot Color	1,090,564	$(3,107,880 * 44.48\% * 78.89\%)$

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8.5x14 Spot Color	121,788	$(3,107,880 * 44.48\% * 8.81\%)$
11x17 Spot Color	170,172	$(3,107,880 * 44.48\% * 12.31\%)$

h. Not confirmed. The volume derived from the results presented in USPS-LR-2, for use in my cost analysis, for "More than 15 pages," Duplex pieces is 3,360,132  $(47,661,453 * (20,844,384 / 295,665,025))$ .

i. The following volumes were derived from the results presented in USPS-LR-2, for use in my cost analysis.

8.5x11 Black & White	1,471,729	$(3,360,132 * 55.52\% * 78.89\%)$
8.5x14 Black & White	164,355	$(3,360,132 * 55.52\% * 8.81\%)$
11x17 Black & White	229,649	$(3,360,132 * 55.52\% * 12.31\%)$
8.5x11 Spot Color	1,179,080	$(3,360,132 * 44.48\% * 78.89\%)$
8.5x14 Spot Color	131,673	$(3,360,132 * 44.48\% * 8.81\%)$
11x17 Spot Color	183,984	$(3,360,132 * 44.48\% * 12.31\%)$

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**OCA/USPS-T4-40.** Please refer to NetPost's Commercial Prices, at the 25 percent contribution margin, for "Standard (Two-To-Five Day) Delivery" shown on the rate cards that appear at the end of Attachment E in USPS-LR-2/MC98-1.

- a. Please confirm that the total volume is 203,920,168 ( $295,665,025 * .6897$ ). If you do not confirm, please explain and provide the correct figure.
- b. Please confirm that volume for Simplex pieces is 97,983,641 ( $203,920,168 * .4805$ ). If you do not confirm, please explain and provide the correct figure.
- c. Please confirm that volume for Duplex pieces is 105,936,527 ( $203,920,168 * .5195$ ). If you do not confirm, please explain and provide the correct figure.
- d. Please confirm that the volume for "More than 15 pages," Simplex pieces is 6,908,538 ( $(97,983,641 * (20,844,384 / 295,635,459))$ ). If you do not confirm, please explain and provide the correct figure.
- e. For "More than 15 pages" Simplex pieces, please provide the volume for 8.5x11, 8.5x14 and 11x17 for Black & White, and for 8.5x11, 8.5x14 and 11x17 for Spot color.
- f. Please confirm that the volume for "More than 15 pages," Duplex pieces is 7,469,272 ( $(105,936,527 * (20,844,384 / 295,635,459))$ ). If you do not confirm, please explain and provide the correct figure.
- g. For "More than 15 pages" Duplex pieces, please provide the volume for 8.5x11, 8.5x14 and 11x17 for Black & White, and for 8.5x11, 8.5x14 and 11x17 for Spot color.

**RESPONSE:**

- a. Confirmed. Please see LR-2/MC98-1, Section E, Table 15.
- b. Confirmed, for purposes of my cost analysis. This volume was derived from the results presented in USPS-LR-2..
- c. Confirmed, for purposes of my cost analysis. This volume was derived from the results presented in USPS-LR-2.
- d. Not confirmed. The volume derived from the results presented in USPS-LR-2, for use in my cost analysis, for "More than 15 pages," Simplex pieces is 6,907,847 ( $97,983,641 * (20,844,384 / 295,665,025)$ ).

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- e. The following volumes were derived from the results presented in USPS-LR-2, for use in my cost analysis.
- |                      |           |                                   |
|----------------------|-----------|-----------------------------------|
| 8.5x11 Black & White | 3,025,618 | $(6,907,847 * 55.52\% * 78.89\%)$ |
| 8.5x14 Black & White | 337,884   | $(6,907,847 * 55.52\% * 8.81\%)$  |
| 11x17 Black & White  | 472,118   | $(6,907,847 * 55.52\% * 12.31\%)$ |
| 8.5x11 Spot Color    | 2,423,982 | $(6,907,847 * 44.48\% * 78.89\%)$ |
| 8.5x14 Spot Color    | 270,697   | $(6,907,847 * 44.48\% * 8.81\%)$  |
| 11x17 Spot Color     | 378,238   | $(6,907,847 * 44.48\% * 12.31\%)$ |
- f. Not confirmed. The volume derived from the results presented in USPS-LR-2, for use in my cost analysis, for "More than 15 pages," Duplex pieces is 7,468,525  $(105,936,527 * (20,844,384 / 295,665,025))$ .
- g. The following volumes were derived from the results presented in USPS-LR-2, for use in my cost analysis.
- |                      |           |                                   |
|----------------------|-----------|-----------------------------------|
| 8.5x11 Black & White | 3,271,194 | $(7,468,525 * 55.52\% * 78.89\%)$ |
| 8.5x14 Black & White | 365,309   | $(7,468,525 * 55.52\% * 8.81\%)$  |
| 11x17 Black & White  | 510,437   | $(7,468,525 * 55.52\% * 12.31\%)$ |
| 8.5x11 Spot Color    | 2,620,726 | $(7,468,525 * 44.48\% * 78.89\%)$ |
| 8.5x14 Spot Color    | 292,668   | $(7,468,525 * 44.48\% * 8.81\%)$  |
| 11x17 Spot Color     | 408,938   | $(7,468,525 * 44.48\% * 12.31\%)$ |

# DECLARATION

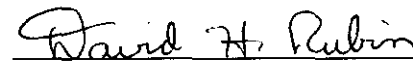
I, Paul G. Seckar, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul G Seckar

Dated: NOVEMBER 12, 1998

### **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.

  
\_\_\_\_\_  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
November 12, 1998