

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Docket No. MC2000-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PLUNKETT TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T5-4-5)

The United States Postal Service hereby provides the responses of witness Plunkett to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T5-4-5, filed on December 20, 1999.

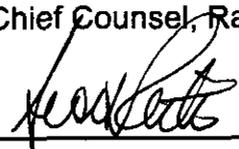
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Scott L. Reiter

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December 28, 1999

**RESPONSE OF POSTAL SERVICE WITNESS PLUNKETT TO INTERROGATORIES  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA-USPS-T-5-4. Please refer to your Exhibit B. What would the Information Technology Unit Costs be if you included the Product Specific IT Costs in the calculation? If you also included advertising costs?

OCA-USPS-T5-4 Response. Including product specific IT costs would result in an average per unit IT cost of 0.32 cents per impression. Adding advertising costs would increase the per unit cost by an additional 0.02 cents per impression.

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OCA/USPS-T5-5. Please refer to your testimony at page 4, line 9 and page 6, lines 1 and 2. Is it your intent that the 0.1 cent for information technology will be charged for each impression over the entire course of the experiment? If so, please explain why you used the unrounded 0.00064 number in calculating your sample fees.

OCA/USPS-T5-5 Response. Please refer to my response to OCA/USPS-T5-2.

## 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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Scott L. Reiter

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December 28, 1999