

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE ALLIANCE OF NONPROFIT MAILERS
REDIRECTED FROM WITNESS TAUFIQUE
(ANM/USPS-T38-5-6)

The United States Postal Service hereby provides its responses to the following interrogatories of the Alliance of Nonprofit Mailers: ANM/USPS-T38-5-6, filed on February 16, 2000, and redirected from witness Taufique. The Postal Service filed objections to interrogatories ANM/USPS-T38-5 and 6 on February 28, although it expressed in that document that it intended to provide responses.

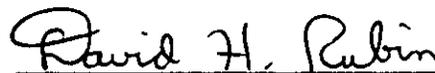
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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March 2, 2000

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ANM/USPS-T38-5. Please identify each characteristic of nonprofit Periodicals mail that the Postal Service has studied, investigated or analyzed since Docket No. R97-1 as a possible cause of the relatively rapid cost increases attributed to the subclass. Produce all documents relating to each such study, investigation or analysis.

RESPONSE:

The Postal Service has not performed any definitive analyses of the subjects described in the interrogatory; however, information regarding trends in Periodicals costs is provided in USPS-LR-I-217 and USPS-LR-I-193.

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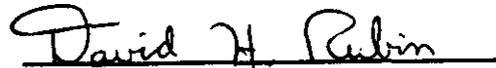
ANM/USPS-T38-6. Please produce all memoranda, correspondence or other communications created by in-house or outside economists, cost analysts or consultants for Postal Service headquarters since July 1, 1998, concerning possible causes of the relatively rapid cost increases attributed to nonprofit Periodicals mail by the Postal Service's costing systems.

RESPONSE:

See USPS-LR-I-217 and USPS-LR-I-193.

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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