

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF ABA&NAPM  
REDIRECTED FROM WITNESS MILLER  
(ABA&NAPM/USPS-T24-30 THROUGH 32 AND 37)

The United States Postal Service hereby provides its responses to the following interrogatories of American Bankers Association and National Association of Presort Mailers, which were filed on March 22, 2000: ABA&NAPM/USPS-T24-30 through 32 and 37.

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

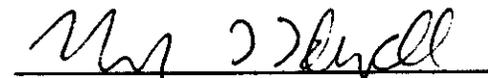
These interrogatories have been redirected from witness Miler to the Postal Service for response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

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April 5, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF  
AMERICAN BANKERS ASSOCIATION & NATIONAL ASSOCIATION OF PRESORT  
MAILERS REDIRECTED FROM WITNESS MILLER**

**ABA&NAPM/USPS-T24-30** What was the USPS's Forwarding/return cost per piece of Undeliverable As Addressed Mail in FY 1998, in FY 1999 (to the extent available), and projected in the test year in this case (Provide separately for return and for forwarding)? Please identify what components are included within such costs, including without limitation, computer forwarding systems, mail processing, transportation, and delivery for Undeliverable As Addressed Mail.

**RESPONSE:**

For the Base Year (FY 1998), the requested costs and available breakdowns can be found in LR-I-82, Tables 5.1.1 and 5.1.2. For the Test Year (FY 2001), the requested costs and available breakdowns can be found in LR-I-110, Tables 5.1.1 and 5.1.2.

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**ABA&NAPM/USPS-T24-31** What was the total USPS cost of forwarding/returning Undeliverable As Addressed Mail in FY 1998, in FY 1999 (to the extent available), and projected in the test year in this case? Please breakout these figures by class of mail, and within FCLM, by rate category.

**RESPONSE:**

For the Base Year (FY 1998), the requested costs can be found in LR-I-82, Tables 5.1.1 and 5.1.2. For the Test Year (FY 2001), the requested costs can be found in LR-I-110, Tables 5.1.1 and 5.1.2. These costs, however, are not available by class of mail or by rate category.

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**ABA&NAPM/USPS-T24-32** What percentage of First Class letter mail was Undeliverable As Addressed in FY 1998, in FY 1999 (to the extent available), and projected in the test year in this case? Please breakout these figures by rate category.

**RESPONSE:**

See the response to MMA/USPS-T24-14 (c1) and (c2). This data are not available at the rate category level.

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**ABA&NAPM/USPS-T24-37** On page 3, lines 17-18, you note that "In some cases, the IOCS provides relevant mail processing unit costs at the rate category level." Please explain why the IOCS can provide mail processing unit costs for two workshared rate categories (carrier route presort and nonautomation presort), but not for the other three rate categories: basic automation, automation three digit presort, and automation five digit presort. Are there any other cases in which the IOCS can be used to produce rate category data for First Class workshared mail? If so, which one(s)? If not, why not?

**RESPONSE:**

See the response to ABA&NAPM/USPS-T24-7(b).

## 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 "M. Tidwell", written over a horizontal line.

Michael T. Tidwell

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