

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

RECEIVED
APR 13 4 43 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF ABA&NAPM
REDIRECTED FROM WITNESS MILLER
(ABA&NAPM/USPS-T24-29)

The United States Postal Service hereby provides its response to the following interrogatory of American Bankers Association and National Association of Presort Mailers, which was filed on March 17, 2000: ABA&NAPM/USPS-T24-29. The interrogatory has been redirected from witness Miller to the Postal Service for response.

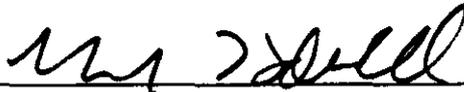
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
April 13, 2000

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

ABA&NAPM/USPS-T24-29 Please refer to the attached table, which reproduces the cost pools used for estimating unit mail processing costs in this case and in R97-1. The items in the four boxes are different categorizations as between the two cases.

(a) For each of the 42 cost pools which have identical labels as between the two rate cases, please define each one and state whether it entails exactly the same operations or work activity as between the two rate cases. If the operations are identical for both cases, and a detailed explanation of each cost pool has been provided in an existing reference, please provide that reference, or a citation to it if it is publicly available.

(b) Please define for R2000-1 cost pools 43 and 44, and state how they differ from cost pool 43 in R97-1.

(c) Please define for R2000-1 cost pools 45-52, and state how they differ from cost pool 46 in R97-1.

(d) For R97-1 cost pools 43-45, please explain why these categories do not appear in R2000-1.

RESPONSE:

(a) In Docket No. R97-1, MODS-Based Costing information can be found in LR-H-146. In this docket, the MODS-Based Costing information that supports the testimony of witness Van Ty Smith (USPS-T-17) can be found in LR-I-106. These *library references explain how the cost pool costs are derived for BMCs, MODS facilities, and Non-MODS facilities.* For the MODS facilities, these library references provide a listing of the operation numbers that are "mapped" to each cost pool. The MODS operations that are used in the field change over time. Therefore, the listings for a given cost pool are not always identical for both dockets. In addition, further descriptions of the cost pools can be found in section 3.1 of the Summary Descriptions for Docket Nos. R97-1 (USPS LR-H-1) and R2000-1 (USPS LR-I-1).

(b) See USPS-T-17, page 17, line 14 through page 18, line 20.

(c) See USPS-T-17, page 10, lines 9-16.

(d) See USPS-T-17, page 17, line 14 through page 18, line 20.

USPS Mail Processing Cost Pools

R-2000-1			R-97-1		
Cost Pool No	Source	Cost Pool Abbreviation	Cost Pool No	Source	Cost Pool Abbreviation
1	BMCS	NMO	1	BMCs	nmo
2	BMCS	OTHR	2	BMCs	Othr
3	BMCS	PLA	3	BMCs	Pla
4	BMCS	PSM	4	BMCs	psm
5	BMCS	SPB	5	BMCs	spb
6	BMCS	SSM	6	BMCs	ssm
7	MODS	BCS/	7	mods	bcs/
8	MODS	OCR/	8	mods	ocr/
9	MODS	FSM/	9	mods	fsm/
10	MODS	LSM/	10	mods	lsm/
11	MODS	MECPARC	11	mods	mecparc
12	MODS	SPBS OTH	12	mods	spbs Oth
13	MODS	SPBSPRIO	13	mods	spbsPrio
14	MODS	1SACKS M	14	mods	1SackS_m
15	MODS	MANF	15	mods	manf
16	MODS	MANL	16	mods	manl
17	MODS	MANP	17	mods	manp
18	MODS	PRIORITY	18	mods	priority
19	MODS	LD15	19	mods	LD15
20	MODS	1BULKPR	20	mods	1Bulk pr
21	MODS	1CANCMP	21	mods	1CancMPP
22	MODS	1OPBULK	22	mods	1OPbulk
23	MODS	1OPREF	23	mods	1OPpref
24	MODS	1PLATFRM	24	mods	1Platfrm
25	MODS	1POUCHING	25	mods	1POUCHNG
26	MODS	1SACKS H	26	mods	1SackS_h
27	MODS	1SCAN	27	mods	1SCAN
28	MODS	BUSREPLY	28	mods	BusReply
29	MODS	EXPRESS	29	mods	express
30	MODS	MAILGRAM	30	mods	MAILGRAM
31	MODS	REGISTRY	31	mods	Registry
32	MODS	REWRAP	32	mods	REWRAP
33	MODS	1EEQMT	33	mods	1EEQMT
34	MODS	INTL	34	mods	INTL
35	MODS	LD41	35	mods	LD41
36	MODS	LD42	36	mods	LD42
37	MODS	LD43	37	mods	LD43
38	MODS	LD44	38	mods	LD44
39	MODS	LD48 EXP	39	mods	LD48 Exp
40	MODS	LD48 SSV	40	mods	LD48_SSV
41	MODS	LD49	41	mods	LD49
42	MODS	LD79	42	mods	LD79
43	MODS	1SUPP F1	43	mods	1SUPPORT
44	MODS	1SUPP F4	44	mods	1MISC
			45	mods	LD48 Oth
			46	Non Mods	
			47		
			48		
			49		
			50		
			51		
			52		

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
April 13, 2000