

DOCKET SECTION

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**UNITED STATES POSTAL SERVICE
FOLLOW-UP INTERROGATORY TO ABA&EEI&NAPM WITNESS CLIFTON
(USPS/ABA&EEI&NAPM-T1-1-41)**

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following follow-up interrogatory to ABA&EEI&NAPM witness Clifton:

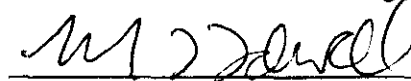
USPS/ABA&EEI&NAPM-T1-1-41.

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
February 20, 1998

**FOLLOW-UP INTERROGATORY OF THE UNITED STATES POSTAL
SERVICE TO ABA/EEL/NAPM WITNESS CLIFTON**

USPS/ABA/EEL/NAPM-T1-41.

Please refer to your response to USPS/ABA/EEL/NAPM-T1-13. In response to a request that you calculate the elasticity shown in your Technical Appendix A.4, using total mail processing labor (direct plus overhead), for the periods FY90 to FY92 and FY 91 to FY 93, you indicated that you were unable to do so because you did not have the necessary data. The necessary data, from the Cost & Revenue Analysis reports for the aforementioned fiscal years, are attached. Please calculate the elasticity shown in your Technical Appendix A.4 for the periods FY 90 to FY 92 and FY 91 to FY 93 using total mail processing labor (direct and overhead).


First-Class Presort Mail Processing Labor Costs FY1990 to FY1993

Fiscal Year	(1) Mail Processing Labor Direct and Overhead Costs (in 000s of \$)	(2) Volumes (in 000s)	(3) Mail Processing Labor Direct and Overhead Costs Per Piece (Cents/Piece)
1990	925,766	27,584,597	3.356
1991	1,003,478	28,805,316	3.484
1992	1,064,887	31,231,742	3.410
1993	1,131,980	32,650,138	3.467

Sources:	CRA Segments & Components for FY1990 to FY 1993	CRA for FY1990 to FY 1993	C1/C2
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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 cursive script, appearing to read "M. Tidwell", written over a horizontal line.

Michael T. Tidwell

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