

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS LEVINE
TO NAA INTERROGATORIES
(NAA/USPS-T1-6 THROUGH T1-8, REDIRECTED FROM WITNESS SCHERER)

The United States Postal Service hereby provides the responses of witness Levine to the following interrogatories of the Newspaper Association of America: NAA/USPS-T1-6 through T1-8, filed on April 30, 2001.

The interrogatories have been redirected from witness Scherer to witness Levine for response.


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


Michael T. Tidwell

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Washington, D.C. 20260-1137
May 11, 2001

Response of Postal Service Witness Jonathan D. Levine to
Interrogatories of the Newspaper Association of America
[Redirected from Witness Tom Scherer]

NAA/USPS-T1-6. Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 200 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between the two mailings of which you are aware.

RESPONSE:

Please see my response to NAA/USPS-T2-4.

Response of Postal Service Witness Jonathan D. Levine to
Interrogatories of the Newspaper Association of America
[Redirected from Witness Tom Scherer]

NAA/USPS-T1-7. Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 100 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between the two mailings of which you are aware.

RESPONSE:

The mail processing cost avoidance difference between the two mailings is \$84 (\$0.42 per piece x 200 pieces). There are no other mail processing cost differences I am aware of related to the size of the mailings. Please see my response to NAA/USPS-T2-3 for the effect of the size of the mailing on acceptance and mail handling costs.

Response of Postal Service Witness Jonathan D. Levine to
Interrogatories of the Newspaper Association of America
[Redirected from Witness Tom Scherer]


NAA/USPS-T1-8. Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 200 pieces presorted evenly (100 pieces each) between two 5-digit ZIP Codes. Please identify any presort-related cost differences between the two mailings of which you are aware.

RESPONSE:

The mail processing cost avoidance difference between the two mailings is \$42 (\$0.42 per piece x 100 pieces). There are no other mail processing cost differences I am aware of related to the size of the mailings. Please see my response to NAA/USPS-T2-3 for the effect of the size of the mailing on acceptance and mail handling costs.

DECLARATION

I, Jonathan Levine, hereby declare, under penalty of perjury, that the foregoing Postal Rate Commission Docket No. MC2000-1 interrogatory answers are true to the best of my information, knowledge and belief.


Jonathan Levine

5-11-01
Date

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.


Michael T. Tidwell

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