

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PLUNKETT TO INTERROGATORY OF
PARCEL SHIPPERS ASSOCIATION
(PSA/USPS-T36-1)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of Parcel Shippers Association:

PSA/USPS-T36-1, filed on March 16, 2000.

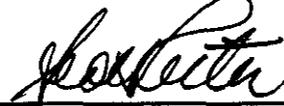
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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March 30, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORIES OF THE PARCEL SHIPPERS ASSOCIATION

PSA/USPS-T36-1

Please refer to Attachment H, Column "Effective Passthroughs" from your testimony.

- (a) What is the meaning of the number "5.798" in row 34 of this column?
- (b) How did you calculate this figure?
- (c) How did you use this figure in your rate design?

PSA/USPS-T36-1 Response

The number 5.798 in this column is the difference between the non-machinable cost differences for DDU and DBMC pieces over 108", which appear in an adjacent column. The number was inadvertently retained in the document and, unlike the other numbers in the same column, was not used in rate design.

DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 3/30/00

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 "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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March 30, 2000