

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 HUNTER TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T5-3-4)

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of United Parcel Service: UPS/USPS-T5-3-4, filed on January 21, 2000. The Postal Service originally objected to these interrogatories, but subsequent discussion between counsel has generated these modified forms of the original questions that obviate further motions practice at this time.

Each interrogatory is stated verbatim, in the form agreed to by counsel, and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

K N Hollies  
Kenneth N. Hollies

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T5-3** [as modified by agreement among counsel]. Refer to page 3 of your testimony at lines 1-6. Please provide the number of PERMIT, non-PERMIT and sampled non-PERMIT offices and the proportions of volume by First-Class Mail, permit imprint Priority Mail, Periodicals, Standard Mail (A), permit imprint Parcel Post and Bound Printed Matter in each of those categories of offices.

**RESPONSE.** The table below provides the estimated proportion of total volume for the 2,138 automated offices used in the BRPW by First-Class Mail, permit imprint Priority Mail, Periodicals, Standard Mail (A), and permit imprint Parcel Post and Bound Printed Matter mail category.

**FY 1998 BRPW AUTOMATED OFFICE SEGMENT**

Mail Category	Est. Volume (%)
First-Class Mail	96.6
Permit Imprint Priority Mail	100
Periodicals	92.6
Standard Mail (A)	95.6
Permit Imprint Parcel Post	99.1
Permit Imprint BPM	98.7

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T5-4** [as modified by agreement among counsel]. Refer to page 3 of your testimony at lines 1-6, where you refer to "a supplemental stratified random sample of non-automated post offices." Please provide the number of PERMIT, non-PERMIT and sampled non-PERMIT offices and the proportions of volume by First-Class Mail, permit imprint Priority Mail, Periodicals, Standard Mail (A), permit imprint Parcel Post and Bound Printed Matter in each of those categories of offices.


**RESPONSE.** The table below provides the number of non-automated bulk mail acceptance and sampled offices used in the BRPW and the estimated proportion of total volume by First-Class Mail, permit imprint Priority Mail, Periodicals, Standard Mail (A), and permit imprint Parcel Post and Bound Printed Matter mail category.

**FY 1998 BRPW NON-AUTOMATED OFFICE SEGMENT**

Mail Category	Non-Automated Sites		Sampled Non-Automated Sites	Est. Volume (%)
	Permit Imprint	Postage Affixed		
First-Class Mail	8,715	20,234	46	3.4
Permit Imprint Priority Mail	8,715		18	0.0
Periodicals	6,103		25	7.4
Standard Mail (A)	18,528	20,234	49	4.4
Permit Imprint Parcel Post	42		0	0.9
Permit Imprint BPM	2,269		21	1.3

# DECLARATION

I, Herbert B. Hunter III, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
Herbert B. Hunter III

Date: FEB. 15, 2000

## **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.

K N Hollies  
Kenneth N. Hollies

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