

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 MEEHAN TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T11-1-2)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of United Parcel Service: UPS/USPS-T11-1-2, filed on February 3, 2000.

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



Susan M. Duchek

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February 17, 2000

**Response of United States Postal Service Witness Meehan
to
Interrogatories of United Parcel Service**

UPS/USPS-T11-1. Refer to pages 3-9 of your testimony, where you discuss changes in the treatment of costs and the development of base year costs. Identify any instances in which the Postal Service has departed from the costing methods used by the Commission in Docket No. R97-1 that are not discussed in your testimony or in the testimony of any other Postal Service witness, describe the change, and explain why the change was made.

Response:

To the best of my knowledge, my testimony discusses, or has pointed to the witness who discusses, all changes in the treatment of costs between the Postal Service's Base Year 1996 CRA and the Postal Service's Base Year 1998 CRA.

If you are asking about the differences between the Postal Service's Base Year 1998 CRA and the Commission's Base Year 1998 cost model, it is my understanding that the Commission version of the base year model is provided in USPS-LR-I-130. It is also my understanding that a comparison of that library reference with my workpapers and exhibits will show all differences.

**Response of United States Postal Service Witness Meehan
to
Interrogatories of United Parcel Service**

UPS/USPS-T11-2. For each change in costing method listed in response to UPS/USPS-T-11, explain all consequences of the change on Base Year 1998 costs as compared to the costs that would have resulted in the absence of the change.

Response:

Since, to the best of my knowledge, there are no changes between the Postal Service's Base Year 1996 CRA and the Postal Service's Base Year 1998 CRA that are not already discussed in my testimony (or others' testimonies), there are no consequences to explain.

If you are interested in the cost differences between the Postal Service's Base Year 1998 CRA and the Commission's Base Year 1998 model, it is my understanding that a comparison of the materials contained in USPS-LR-I-130 with my workpapers and exhibits will show all differences and the consequences of those differences.

DECLARATION

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

Karen B. Meehan

Dated: 2/17/00

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 "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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