

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 EGGLESTON TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T26-4)

The United States Postal Service hereby provides the response of witness Eggleston to the following interrogatory of United Parcel Service: UPS/USPS-T26-4, filed on February 10, 2000.

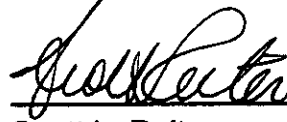
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999 Fax -5402
February 24, 2000

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

UPS/USPS-T26-4. Identify all instances in which you have relied on or used in your testimony in any way any FY 1999 cost, revenue, volume, or other data, and state in each such instance why you used FY 1999 data instead of data for BY 1998.

RESPONSE:

BY 1998 data were used whenever possible. However, in several instances there were reasons why FY 1999 data were used instead. The following is a list of all the instances where my testimony relies on FY 1999 data and the reasons why I used FY 1999 data instead of BY 1998 data.

FY 1999 data are used in Attachment A, page 6, column 15. These data, the average cube of Parcel Post oversize parcels, rely on data presented on page 377 of LR-I-105 (FY 1999 Postal Quarter 3, total cube, volume, and weight of Parcel Post oversize parcels). Since the Postal Service did not accept parcels with a length plus girth over 108 inches until January 10, 1999, cube and volume data for oversize parcels did not exist in FY 1998. Therefore, it was necessary to use FY 1999 data.

Attachment Y, page 1 also uses FY 1999 data. These data were collected by BMC Operations during FY 1999. These data are used in the Parcel Post (Attachment A, page 5, references 6, 7, and 16) and Special Standard (Attachment P, page 5, references 6, 7, and 13) mail processing models. There is no reason to believe that FY 1998 data would be significantly different.

Attachment Y, page 2 uses FY 1999 data. These data were collected from ASFs during FY 1999. These data are used to estimate DBMC mail processing cost savings on page 2 of Attachment F, row 3. There is no reason to believe that FY 1998 data would be significantly different.

DECLARATION

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

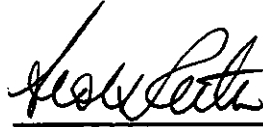


JENNIFER L. EGGLESTON

Dated: 2-24-00

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.



Scott L. Reiter

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