

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

RECEIVED

FEB 24 5 01 PM '00

POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
Docket No. R2000-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DANIEL TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T28—1)**

The United States Postal Service hereby provides the response of witness Daniel to the following interrogatory of United Parcel Service: UPS/USPS-T28—1, filed on February 10, 2000.

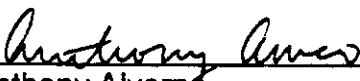
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax --6187
February 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO
INTERROGATORY OF UNITED PARCEL SERVICE**

UPS/USPS-T28-1. Identify all instances in which you have relied on or used in your testimony in any way any FY1999 cost, revenue, volume or other data, and state in each such instance why you used FY1999 data instead of data for BY 1998.

RESPONSE:

I use FY1999 volume data to calculate final adjustments for the FY99 rollforward. These data are consistent with those used by witness Kashani (USPS-T-14).

DECLARATION

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


SHARON DANIEL

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.



Anthony Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 24, 2000