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 THRESS TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS–T7-1)

The United States Postal Service hereby provides the response of witness Thress to the following interrogatory of United Parcel Service: UPS/USPS–T7-1, 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

Eric P. Koetting

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February 24, 2000

RESPONSE OF POSTAL SERVICE WITNESS THRESS TO
UNITED PARCEL SERVICE INTERROGATORIES

UPS/USPS-T7-1   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:

All of the econometric analysis used in my testimony relied upon data through 1999Q4. In all cases, complete data for both 1998 and 1999 was included in my analyses, so that it would be incorrect to say that I used 1999 data "instead of data for BY 1998." My use of 1999 data in my analysis is consistent with past practice in the forecasting area to use the most recent available volume data.

DECLARATION

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

_____
(Signed)

2-23-00
(Date)

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.

Eric P. Koetting

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