

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 KASHANI TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T14-1)

The United States Postal Service hereby provides the response of witness Kashani to the following interrogatory of United Parcel Service: UPS/USPS-T14-1, 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



Susan M. Duchek

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February 24, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KASHANI
TO INTERROGATORY OF
UNITED PARCEL SERVICE

UPS/USPS-T14-1 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

I have only used revenue and volume for FY 1999. Both FY 1999 revenue and volume are used in the development of Cost and Revenue Analysis Report and Statistics by Class of Mail in Exhibits 14D, 14G, 14J, and 14M. The FY 1999 volume is also used to develop the rollforward change factor for mail volume, as shown in Exhibit 14A, page 9.

DECLARATION

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

Cameron Kashani

Dated: 2/24/2000

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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