

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 TOLLEY TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T6-9)

The United States Postal Service hereby provides the response of witness Tolley to the following interrogatory of United Parcel Service: UPS/USPS-T6-9, 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

475 L'Enfant Plaza West, S.W.  
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(202) 268-2992 Fax -5402  
February 24, 2000

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY TO  
UNITED PARCEL SERVICE INTERROGATORIES**

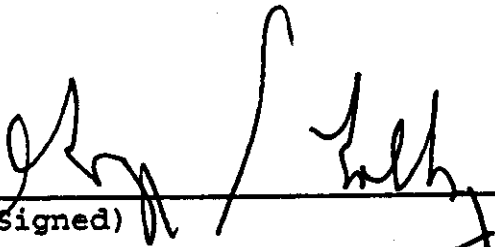
**UPS/USPS-T6-9 Identify all instances in which you have relied on or used in your testimony in any way any FY 1999 cost, revenue, volume, or other data, and state in each such instance why you used FY 1999 data instead of data for BY 1998.**

**RESPONSE:**

**The base volumes used by me to make volume forecasts were 1999 volumes. This is consistent with past practice in the forecasting area of using the most recent available volume data.**

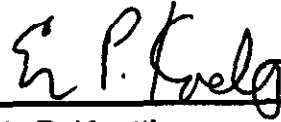
DECLARATION

I, George Tolley, 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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