

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 MAYO
TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T39-1)

The United States Postal Service hereby provides the response of witness Mayo to the following interrogatory of United Parcel Service: UPS/USPS-T39-1, 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



David H. Rubin

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February 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T39-1)**

UPS/USPS-T39-1. 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 did not rely directly on or use directly in my testimony any FY 1999 cost, revenue, volume, or other data. I did rely directly on inputs from other witnesses who may have used FY 1999 data. These inputs include the volume forecasts from witness Tolley, Delivery Confirmation volume forecasts from witness Robinson, and cost data from witnesses Kay, Eggleston, Campbell, Davis and Kaneer. Please refer to their responses to this identical interrogatory.

DECLARATION

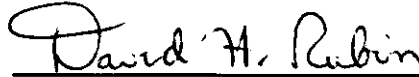
I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

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.



David H. Rubin
David H. Rubin

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