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

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PESTAL RATE OUR DESIGNARY OFFICE OF THE DESHEMARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO INTERROGATORY OF UNITED PARCEL SERVICE (UPS/USPS-T17-1)

The United States Postal Service hereby provides the response of witness Van-Ty-Smith to the following interrogatory of United Parcel Service:

UPS/USPS-T17-1, 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

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 February 24, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VAN-TY-SMITH TO UPS INTERROGATORIES

UPS/USPS-T17-1. 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 TO UPS/USPS-T17-1.

There were no such instances, to the best of my knowledge.

DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

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.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 February 24, 2000