

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

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS CRUM TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T27-1)

The United States Postal Service hereby provides the responses of witness Crum to the following interrogatory of the United Parcel Service: UPS/USPS-T27-1, filed on February 10, 2000.

Each 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


Richard T. Cooper

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February 24, 2000

U.S POSTAL SERVICE WITNESS CHARLES L. CRUM
RESPONSE TO INTERROGATORY
OF UNITED PARCEL SERVICE

UPS/USPS-T27-1.

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.

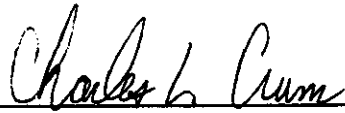
RESPONSE

The Standard Mail (B) Bound Printed Matter Mail Characteristics Study contained in USPS LR-I-109 was conducted during FY 1999. However, the data presented in Attachment H, Tables 1 through 2.1 of my testimony and the entirety of the study tie the entry profile data collected to the official volumes from FY 1998.

Both the "Percent Sorted to 5-digits ..." and the "Destinating BMCs will feed ..." mail flow operating assumptions contained in Attachment J, Table 1.3 of my testimony use data from FY 1999. Please see the third paragraph of witness Eggleston's response to UPS/USPS-T26-4 for an explanation of why 1999 data was used.

DECLARATION

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



CHARLES L. CRUM

Dated: 24 FEBRUARY 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.


Richard T. Cooper

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