

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 MAYES TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T32-1)

The United States Postal Service hereby provides the response of witness Mayes to the following interrogatory of United Parcel Service: UPS/USPS-T32-1 (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



Michael T. Tidwell

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February 24, 2000

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T32-1. 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:

All data used in the preparation of my exhibits and discussed in my testimony were derived from the work of other witnesses in this docket. For instance, incremental cost figures were obtained from witness Kay (USPS-T-23); volume variable cost figures were obtained from witness Kashani (USPS-T-14); volume forecasts were obtained from witnesses Tolley (USPS-T-6) and Musgrave (USPS-T-8); revenue calculations were obtained from the pricing witnesses (USPS-T-33 through USPS-T-39). To the extent that any of these witnesses may have incorporated data from FY 1999 into the preparation of the figures in their testimony upon which my work relied, there would be, by extension, some FY 1999 data forming the basis of my work. In order to accurately assess the extent to which FY 1999 data was used in the work of the witnesses listed above, please refer to their responses to this identical interrogatory.

DECLARATION

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


Virginia J. Mayes

Dated:

2-23-00

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.



Michael T. Tidwell

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