

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 YACOBUCCI TO INTERROGATORY OF UNITED PARCEL  
SERVICE  
(UPS/USPS-T25—1)**

The United States Postal Service hereby provides the response of witness Yacobucci to the following interrogatory of United Parcel Service: UPS/USPS-T25—1, filed on February 10, 2000.

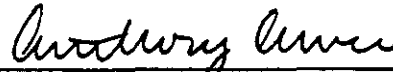
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Anthony Alverno  
Attorney

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February 24, 2000

**RESPONSE OF U.S. POSTAL SERVICE WITNESS YACOBUCCI TO  
INTERROGATORY OF UNITED PARCEL SERVICE**

**UPS/USPS-T25-1.** 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:**

FY 1999 data from USPS LR-I-87, Periodicals Mail Characteristics Study, and USPS LR-I-88, Flats Bundle Study, are used in USPS LR-I-90, Flats Mail Processing Cost Model. In both cases, FY 1999 data are used instead of BY 1998 data because BY 1998 data do not exist.

USPS LR-I-87 provides the following FY 1999 data: Periodicals volumes by container type and presortation level, pieces per bundle, the percentage of nonbarcoded flats that is machinable, and the percentage of barcoded flats that is machinable.

USPS LR-I-88 provides the following FY 1999 data: the number of bundle handlings, the percentage of bundle handlings, the bundle breakage rate, bundle downflow densities, and manual bundle sorting productivities.

**DECLARATION**

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

*David Yacobucci*

\_\_\_\_\_  
DAVID YACOBUCCI

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.

  
\_\_\_\_\_  
Anthony Alverno

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