

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 CAMPBELL TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T29-1)

The United States Postal Service hereby provides the response of witness Campbell to the following interrogatory of United Parcel Service: UPS/USPS-T29-1 (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 THE UNITED STATES POSTAL SERVICE  
WITNESS CAMPBELL  
TO INTERROGATORY OF UNITED PARCEL SERVICE**

**UPS/USPS-T29-1.**

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 following table summarizes my use of FY 1999 data and the reason why FY 1999 data was used. Please see the library reference citations where specific fiscal year data usage is provided.

<b>Instance</b>	<b>Reason</b>	<b>Cites</b>
Address Correction Service (ACS) estimated costs	ACS cost study conducted in FY99.	USPS LR-I-160, A1-A3 USPS LR-I-110
Caller Service (CS) estimated costs	CS cost study conducted in FY99.	USPS LR-I-160, C1-C5
Business Reply Mail (BRM) estimated costs	PERMIT System study conducted in FY99.	USPS LR-I-160, B1
Qualified BRM discount	Mail flow density study conducted in FY99.	USPS LR-I-160, L7-L8
Nonletter-size BRM estimated costs	Cost survey conducted in FY99.	USPS LR-I-160, K1

**DECLARATION**

I, Chris F. Campbell, declare under penalty of perjury that the foregoing answers are true to the best of my knowledge, information and belief.

Chris F. Campbell  
Chris F. Campbell

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.



Michael T. Tidwell

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