

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 DAVIS
TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T30-1)

The United States Postal Service hereby provides the response of witness Davis to the following interrogatory of United Parcel Service: UPS/USPS-T30-1, filed on February 10, 2000.

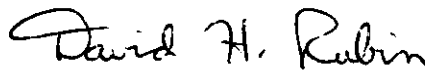
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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Washington, D.C. 20260-1137
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February 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAVIS
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T30-1. 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:

I have relied on or used in my testimony FY 1999 data in the following instances:

- The cost study for accountable mail – return receipt service relies in part on data collected from a field survey of accountable mail clerks during FY 1999. I used FY 1999 data in this instance because the field survey was distributed and conducted in FY 1999. This study is described in USPS-T-30, p. 12 and in USPS-LR-I-108, pp. 77-79.
- The cost study for on-site meter service relies in part on data collected from a field survey of postal clerks and a direct distribution center report during FY 1999. I used FY 1999 data in this instance because the field survey was distributed and conducted in FY 1999. This study is described in USPS-T-30, pp. 15-17 and in USPS-LR-I-108, pp. 72-73, 80-82.
- The cost study for post office box key and lock service relies in part on data collected from a field survey of postal clerks during FY 1999. I used FY 1999 data in this instance because the field survey was distributed and conducted in FY 1999. This study is described in USPS-T-30, pp. 19-20 and in USPS-LR-I-108, pp. 83-86.
- The cost study for delivery confirmation relies in part on FY 1999 data for carrier route types and for the proportion of delivery confirmation retail

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TO INTERROGATORIES OF UNITED PARCEL SERVICE
UPS/USPS-T30-1, Page 2 of 2**

volume that bypasses window acceptance. I used FY 1999 data for these specific inputs because these were the data provided by internal sources supplying me with information. This study is described in USPS-T-30, pp. 3-8 and in USPS-LR-I-108, pp. 1-23.

DECLARATION

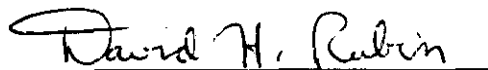
I, Scott J. Davis, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Scott J Davis

Dated: Feb. 24, 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.



David H. Rubin

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