

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS ROBINSON TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T34-2)

The United States Postal Service hereby provides the responses of witness Robinson to the following interrogatory of the United Parcel Service: UPS/USPS-T34-2, filed on February 10, 2000.

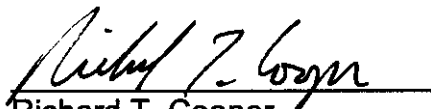
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
February 24, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T34-2.** 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 relied directly on FY 1999 cost, revenue, volume or other data in my testimony in one instance. As described in my testimony (USPS-T34, page 19, lines 8 through 9), "I project delivery confirmation volumes associated with Priority Mail and Standard (B) based on FY 1999 delivery confirmation program scanner data . . ." This data is presented in USPS-T34, Attachment J. I used FY 1999 data instead of BY 1998 data because three of the four delivery confirmation service options (retail Priority Mail, and electronic and retail Standard (B)) were not available during BY 1998.

I am unable to identify all instances in which I may have indirectly relied on or used in my testimony in any way FY 1999 cost, revenue, volume, or other data which is incorporated in the results of other witnesses used as inputs to my testimony.

**DECLARATION**

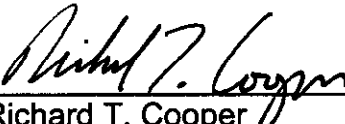
I, Maura Robinson, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
MAURA ROBINSON

Dated: 2.24.2000

## 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.

  
Richard T. Cooper

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February 24, 2000