

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

**ORIGINAL**

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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 MILLER TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T24-1)

The United States Postal Service hereby provides the response of witness Miller to the following interrogatory of United Parcel Service: UPS/USPS-T24-1 (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 UNITED STATES POSTAL SERVICE WITNESS MILLER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T24-1** 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:**

My testimony relied on the following FY 1999 data sources:

(1) AP 11 FY 99 Letters/Cards Density Study

This study is an update of MCR-3 in Docket No. MC95-1 and is described in Appendix IV of my testimony. The data itself can be found in Miller Workpaper 1. Mail flow densities are used to flow mail from one operation to another in my cost models. Base year data were not used because densities change over time as equipment types and equipment sizes change. Therefore, the data were updated to reflect the most current letters and cards mail processing environment.

(2) AP 8 FY 99 Finalization on Automation Secondary Tracking (FAST) Data

These data can be found in Attachment USPS-T-24A of my testimony. The FAST data are used in my models to flow mail through the automation incoming secondary operations. Base year data were not used because the type of incoming secondaries that are used to process mail change over time. Therefore, the data were updated to reflect the most current letters and cards mail processing environment.

(3) AP 11 FY 99 MODS Volumes

These data can be found in Appendices I (page I-45), II (page II-32), and III (page III-32) of my testimony. The data are used to develop weighted piggyback factors based on the percentages of mail volumes that are processed on the Mail Processing Bar Code Sorters (MPBCS) versus the Delivery Bar Code Sorters (DBCS).

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

**RESPONSE to UPS/USPS-T24-1 (Continued)**

The manner in which these machine types have been utilized has changed over time.

Therefore, the data were updated to reflect the most current letters and cards mail processing environment.

**DECLARATION**

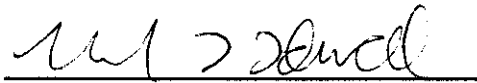
I, Michael W. Miller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Michael W. Miller", is written over a horizontal line.

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.

A handwritten signature in cursive script, appearing to read "Michael T. Tidwell", is written above a horizontal line.

Michael T. Tidwell

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