

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

RECEIVED
FEB 24 5 28 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T35—1)**

The United States Postal Service hereby provides the response of witness Moeller to the following interrogatory of United Parcel Service: UPS/USPS-T35—1, filed on February 10, 2000.

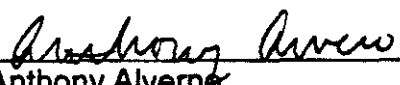
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Anthony Alverno
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 24, 2000

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

UPS/USPS-T35-1. 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 did not directly use any FY 1999 data. The rate design does include information from other witnesses that may have incorporated some FY 1999 data. See the responses of witnesses Tolley (UPS/USPS-T6-9), Thress (UPS/USPS-T7-1), Tayman (UPS/USPS-T9-1), Kingsley (UPS/USPS-T10-4), Kashani (UPS/USPS-T14-1), Yacobucci (UPS/USPS-T25-1), Eggleston (UPS/USPS-T26-4), Crum (UPS/USPS-T27-1), Daniel (UPS/USPS-T28-1), and Mayes (UPS/USPS-T32-1).

DECLARATION

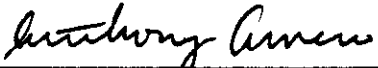
I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


JOSEPH D. MOELLER

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -6187
February 24, 2000