

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS MUSGRAVE TO INTERROGATORY OF  
UNITED PARCEL SERVICE,  
REDIRECTED FROM WITNESS ROBINSON  
(UPS/USPS-T34-8)

The United States Postal Service hereby provides the response of witness Musgrave to the following interrogatories of United Parcel Service: UPS/USPS-T34-8, filed on February 15, 2000, and redirected from witness Robinson.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
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(202) 268-2992, Fax -5402  
February 29, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MUSGRAVE  
TO INTERROGATORIES OF UNITED PARCEL SERVICE  
(Redirected form Witness Robinson, USPS-T34)**

**UPS/USPS-T34-8.** (a) Provide for the period from January 10, 1999 to the end of FY 1999, and, separately, for the period from January 10, 1999, to the most recent date for which such information is available, the volume of pieces that switched from Priority Mail to First Class Mail as a result of the classification change in Docket No. R97-1 which reclassified pieces weighing more than 11 ounces but not more than 13 ounces from Priority Mail to First Class Mail.

(b) Provide the Postal Service's best estimate of the number of pieces of mail that will shift from Priority Mail to First Class Mail in (i) FY 2000 and, separately, (ii) in the Test Year, as a result of the reclassification from Priority Mail to First Class Mail of pieces weighing more than 11 ounces but not more than 13 ounces.

**Response:**

(a) From January 10, 1999 to the end of FY 1999, the estimate of the transferred volume is approximately 90 million pieces. (See LR-I-114, Section A, page 5, Step 2, part d.) To obtain the sum of the transfer volume from January 10, 1999 to the most recent date, one would add quarter one of FY 2000 to the above figure and the estimate of the transferred volume would be approximately 123 million pieces. (See LR-I-114, page 8.)

(b) The best estimate of the transfer volume for FY 2000 is 150 million pieces. (See LR-I-114, page 8.) The best estimate of the test year GFY 2001 before-rates transfer volume is 165 million pieces and the test year after-rates GFY 2001 transfer volume is 157 million pieces. (See LR-I-114, page 8 for before-rates and page 15 for after-rates transfer volume.)

**DECLARATION**

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

G. MUSGRAVE

Dated: 2/25/00

## 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.



Eric P. Koetting

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