

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 PLUNKETT TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T9-2)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of United Parcel Service: UPS/USPS-T9-2, filed on February 16, 2000.

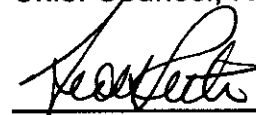
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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March 2, 2000

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

UPS/USPS-T36-2. Refer to page 13, lines 24-25, of your testimony, where you state that you "imposed constraints in order to mitigate [parcel post] rate changes." Provide a table comparing your proposed rates for parcel post, by rate category, with the rates that would result if the constraints you imposed to mitigate rate changes were not imposed.

UPS/USPS-T36-2 Response. Please refer to attachment I to my testimony.

Pages 1-3 show the preliminary unconstrained rates. Pages 4-6 show rates after constraints have been imposed.

DECLARATION

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

Michael K. Plunkett

Dated: 3/2/00

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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a solid horizontal line.

Scott L. Reiter

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