

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 DEGEN TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T16-2)

The United States Postal Service hereby provides the response of witness Degen to the following interrogatory of United Parcel Service: UPS/USPS-T16-2, filed on February 23, 2000. An objection to interrogatory UPS/USPS-16-4 was filed on March 3, 2000 by the attorney for witness Ramage. Interrogatory UPS/USPS-3 was redirected to the Postal Service, and a separate response is being filed today.

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



Eric P. Koetting

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March 8, 2000

**Response of United States Postal Service Witness Degen
To Interrogatory of United Parcel Service**

UPS/USPS-T16-2. Refer to Table 8 at page 66 of your testimony. Provide the FY95 IOCS Platform distribution key for items in containers for all individual mail subclasses.

UPS/USPS-T16-2 Response.

The requested data are provided in Attachment 1 to this response.

**Table 8
 FY95 IOCS
 Subclass Shares**

Letters and Parcels	37.60%
Presort Letters and Parcels	11.74%
Postal Cards	0.00%
Private Mailing Cards	0.86%
Presort Cards	0.39%
Total First Class	50.59%
Priority	2.17%
Express	0.46%
Within County	0.27%
Outside County - Regular	9.43%
Outside County - Non Profit	1.76%
Outside County - Classroom	0.07%
Total Second Class	11.53%
Third Single Piece Rate	0.87%
Bulk - Regular Carrier Route	5.88%
Bulk - Regular Other	20.45%
Subtotal Third Bulk Regular	26.33%
Bulk - Nonprofit Carrier Route	0.59%
Bulk - Nonprofit Other	4.91%
Subtotal Third Bulk Nonprofit	5.50%
Total Third Class	32.71%
Parcels - Zone Rate	0.50%
Bound Printed Matter	0.39%
Special Rate	0.21%
Library Rate	0.00%
Total Fourth Class	1.10%
USPS	0.29%
Free for Blind/Handicapped	0.10%
International	1.05%
Total	100.00%

DECLARATION

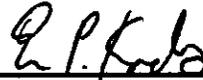
I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.



Dated: 03-07-00

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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