

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
REDIRECTED FROM WITNESS PAFFORD  
UPS/USPS-T4-8

The United States Postal Service hereby provides the response of witness Hunter to the following interrogatory of United Parcel Service: UPS/USPS-8, filed on February 29, 2000, and redirected from witness Pafford.

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

K N Hollies  
Kenneth N. Hollies

**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.

K N Hollies  
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083 Fax -5402  
March 14, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER TO  
INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM  
WITNESS PAFFORD**

**UPS/USPS-T4-8.** Library Reference USPS-LR-I-30, Appendix E, shows revenue, pieces, and weight estimates multiplied by 1.00920754219 for non-automated office data, mail type "PI-SB-PARCELP."

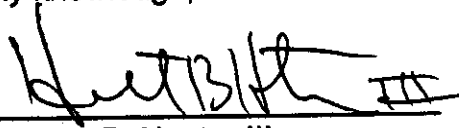
- (a) Explain why this factor is used on the parcel mail type, but not any other types.
- (b) Explain in detail how this factor was developed and provide copies of all analyses and supporting documents used in the development process. Provide the information in electronic format, in originally developed form with formulas intact.

**RESPONSE.**

- a. This factor is developed from a census of permit imprint Parcel Post mail and is applied to the automated office distribution of revenue and volume for the FY 1998 period to account for residual permit imprint Parcel Post activity.
- b. The development of this factor is explained in USPS-LR-I-230/R2000-1. See also the response to UPS/USPS-T5-23(b-c).

DECLARATION

I, Herbert B. Hunter III, hereby 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 black ink, appearing to read "Herbert B. Hunter III", written over a horizontal line.

Herbert B. Hunter III

Date: MARCH 14, 2000