

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

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POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION REDIRECTED  
FROM WITNESS MAYES  
(PSA/USPS-T32-8)

The United States Postal Service hereby provides its response to the following interrogatory of Parcel Shippers Association redirected from witness Mayes: PSA/USPS-T32-8 (filed on March 8, 2000).

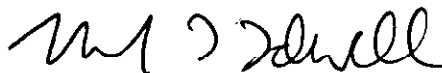
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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Michael T. Tidwell

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March 22, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO PSA INTERROGATORY  
REDIRECTED FROM WITNESS MAYES

PSA/USPS-T32-8.


In PSA/USPS-T32-1 (d) (i) you are asked to describe the corrections made to FY 1997 and 1998 because of the "improved data collection" in your reference. As a response to that question you refer to the Postal Service's response to UPS/USPS-T5-13 redirected from witness Hunter. That answer is not responsive to the question. That question asked you to explain why there was not a large increase in the total revenue from 1997 to 1998 for Parcel Post that corresponded with the large increase in volume. PSA/USPS-T32-1 (d) (i) asked you to describe the corrections that you made to FY 1997 and 1998 because of the improved data collection. The Postal Service response redirected from witness Hunter does not in any way describe the corrections in revenues and volumes that were made to FY 1997 and 1998. Please supply that corrected data for the record.

**Response:**

The phrase improved "data collection" refers to the change made in FY 99 to use mailing statement data for RPW Parcel Post revenues and volumes, instead of the previously used sampling data. The former data represent a census of mailings at automated Bulk Mail Entry Units and, as such, represent an improvement over the previous method. This revision in data sources was applied to official FY 1998 data, but was not applied to official FY 1997 data.

**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 "Michael T. Tidwell". The signature is fluid and cursive, with the first name "Michael" and last name "Tidwell" clearly distinguishable.

**Michael T. Tidwell**

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