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 THRESS TO INTERROGATORIES OF THE PARCEL SHIPPERS ASSOCIATION, REDIRECTED FROM WITNESS MAYES (PSA/USPS-T32-9(a))

The United States Postal Service hereby provides the response of witness

Thress to the following interrogatories of the Parcel Shippers Association:

PSA/USPS-T32-9(a), filed on March 15, 2000, and redirected from witness Mayes.

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. Washington, D.C. 20260–1137 (202) 268–2992 Fax –5402 March 29, 2000

RESPONSE OF POSTAL SERVICE WITNESS THRESS TO INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION REDIRECTED FROM WITNESS MAYES

PSA/USPS-T32-9(a) In response to PSA/USPS-T32-1 (d)(iii), you state that if newer data had been used to develop the R97-1 forecasting, the own-price elasticity estimate for Parcel Post may not have been the same.

(a) Please explain why it may not have been the same.

RESPONSE:

The own-price elasticity is estimated as a function of the historical volume of parcel post mail. If the historical volume of parcel post mail is changed, as was the case with the restatement of the parcel post data, then, mathematically, it stands to reason that the own-price elasticity may also change, as the relationship has changed between volume, which has changed, and price, which has not changed.

DECLARATION

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

(Signed) 3-28-00 (Date)

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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. Ge

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Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2992 Fax -5402 March 29, 2000