

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

Docket No. R2000-1

RESPONSE OF POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES UPS/USPS-T34-23-25

The United States Postal Service hereby provides the responses of Postal Service witness Robinson to the following interrogatories of the United Parcel Service: UPS/USPS-T34-23-25, filed on March 17, 2000. Interrogatories 18-22, 26-27, 29(a) have been redirected to the Postal Service. Objections were filed to interrogatories 28 and 29(b).

Each 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


Richard T. Cooper

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Washington, D.C. 20260-1137
March 31, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T34-23. Provide the volume of Priority Mail by ounce increment for BY1998.

RESPONSE:

See USPS-LR-I-250 to be filed shortly.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T34-24. Provide the volume of Priority Mail by ounce increment for FY1999.

RESPONSE:

See USPS-LR-I-250 to be filed shortly.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T34-25. Confirm that one-day service Priority Mail has an overnight service commitment or standard identical to that for First-Class Mail. If you do not confirm, explain how they differ and the extent of the difference.

RESPONSE:

Not confirmed. I am informed that, for First-Class Mail, 8,744 three-digit ZIP Code pairs have a one-day service standard, and for Priority Mail, 9,029 three-digit ZIP Code pairs have a one-day service standard.

DECLARATION

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


MAURA ROBINSON

Dated: 3.31.2000

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.


Richard T. Cooper

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March 31, 2000