

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

RECEIVED

MAR 31 4 48 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T9-27 REDIRECTED FROM WITNESS TAYMAN AND OCA/USPS-81)
AND REQUEST FOR ADDITIONAL TIME TO RESPOND TO
OCA MOTION TO COMPEL OF MARCH 23, 2000, IF NECESSARY

The United States Postal Service hereby provides its response to the following interrogatories of the Office of the Consumer Advocate OCA/USPS-T9-27, filed on February 23, 2000, and redirected from witness Tayman; and OCA/USPS-81, filed on March 6, 2000. These interrogatories were the subject of a motion to compel filed by the OCA on March 23, 2000.

The Postal Service and the OCA have been negotiating regarding these responses. Although these negotiations are ongoing, the Postal Service did not want to unnecessarily delay provision of the responsive material that it is willing to provide at this time. In the event that further negotiations are not successful, and the OCA continues to seek information that the Postal Service is not willing to provide, the Postal Service requests an additional day after the conclusion of unsuccessful negotiations to respond to any outstanding parts of the OCA's motion to compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
March 31, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS TAYMAN**

OCA/USPS-T9-27.

The following refers to the USPS FY 2000 Operating Plan.

- (a) Please provide the most current USPS FY 2000 Operating Plan by accounting periods for Postal Service operating revenues, appropriations, investment income, expenses and volumes.
- (b) For each of the thirteen accounting periods presented in part "a" of this interrogatory, please provide the most current USPS FY 2000 Operating Plan with operating revenues broken out by mail class and subclass cost categories.

RESPONSE:

- (a) Please see attached.
- (b) Please see response of United States Postal Service to OCA/UPSP-81.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-81. Provide the Postal Service's FY 2000 budget plan in full detail (i.e., by Accounting Period and mail class and subclass).

RESPONSE:

Please see attached.

US POSTAL SERVICE
FY 2000 REVENUE & VOLUME PLANS
MILLIONS

	MAIL VOLUME	REVENUE
FIRST	105,010	36,031
PRIORITY	1,251	4,815
EXPRESS	70	990
PERIODICALS	10,119	2,199
STANDARD A	90,097	15,415
PARCEL POST	359	1,101
INTERNATIONAL	980	1,587
OTHER	1,182	3,286
TOTALS	209,368	65,424

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 "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 31, 2000