

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

RECEIVED
APR 3 4 40 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
WITNESS RAMAGE TO INTERROGATORY OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS DEGEN
(UPS/USPS-T16-4)
(April 3, 2000)

The United States Postal Service hereby provides the response of witness Ramage to the following interrogatory of United Parcel Service: UPS/USPS-T16-4, filed on February 22, 2000, and redirected from witness Degen. A partial objection to the interrogatory was filed on March 3, 2000, followed by a motion to compel filed by United Parcel Service on March 16. The Postal Service filed its opposition to the motion to compel on March 23, which included an indication of could reasonably be provided. On March 29, United Parcel Service filed a notice withdrawing its motion to compel and acceding to the Postal Service March 23 offer regarding what reasonably could be provided. The response conforms to the description in that March 23 pleading.

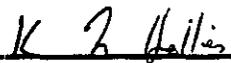
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

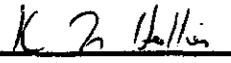
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
April 3, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAMAGE
TO AN INTERROGATORY UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS DEGEN**

UPS/USPS-T16-4. Refer to USPS-LR-I-12, Appendix H, page 3, which states that the IOCS data file provided was developed by "dropping variables not used in development of the CRA ." Provide a version of the IOCS data file which includes the dropped variables.

RESPONSE:

A file containing all remarks corresponding to IOCS questions 21B, 21C, and 21D has been filed as USPS-LR-I-258.

DECLARATION

I, Mark F. Ramage, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Mark F. Ramage

Date: APRIL 3, 2000