

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 HUNTER TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T5-31-34)


The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of United Parcel Service: UPS/USPS-T5-31-34, filed on March 21, 2000. A partial objection to interrogatory UPS/USPS-T5-33 was filed on March 31, 2000.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

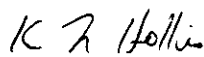
By its attorneys:
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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

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April 4, 2000

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UPS/USPS-T5-31. What document or documents are the source of the information included in the BRPW system? If there are different documents depending on the nature of the post office where a bulk shipment is accepted (e.g., one source for automated offices, a different source for non-automated offices, etc.) or on the basis of whether the shipment is plant-verified or not, or on any other basis, identify for each situation the source of the information used in the BRPW system.

RESPONSE. The source documents underlying the revenue and volume information input to the BRPW are the postage statement form series already identified on page 3 of my testimony at lines 9-12. A copy of each type of postage statement is provided in Appendix A of USPS-LR-I-26/R2000-1.

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UPS/USPS-T5-32. In the case of a plant-verified drop[]shipment, is the information for the BRPW system taken from (a) the postage or mailing statement, (b) Form 8125 (or any variation thereof), or (c) from some other source? If the answer is (c), identify the source.

RESPONSE. See the response to UPS/USPS-T5-31.

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- UPS/USPS-T5-33.** Refer to your response to interrogatory NNA/USPS-T5-14(b)-(c).
- (a) Provide the number of instances during the period from FY1995 through FY1999 that a mailer lost entry privileges as a result of noncompliance with PERMIT entry requirements.
 - (b) Provide the number of instances during the period from FY1995 through FY1999 that the Postal Service instituted civil proceedings, whether administrative or in the courts, against mailers as a result of noncompliance with PERMIT entry requirements. Do not include any instances already included in the response to paragraph (a), above.
 - (c) Provide the number of instances during the period from FY1995 through FY1999 that the Postal Service has sought criminal penalties against a mailer for failure to comply with PERMIT entry requirements.

RESPONSE.

A partial objection to this interrogatory has been filed.

a-c. Zero.

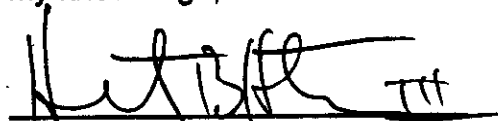
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UPS/USPS-T5-34. Refer to your response to NNA/USPS-T5-7. When was the last time that the panel of sampled offices was "refreshed"?

RESPONSE. The last update to the BRPW office panel was for the PQ1, FY 1998 reporting period.

DECLARATION

I, Herbert B. Hunter III, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.


Herbert B. Hunter III

Date: April 4, 2000