

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 TOLLEY TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T6-12)

The United States Postal Service hereby provides the response of witness Tolley to the following interrogatory of United Parcel Service: UPS/USPS-T6-12, filed on March 22, 2000.

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



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April 5, 2000

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY
TO UPS INTERROGATORIES**

UPS/USPS-T6-12. Refer to Chart H on page 154 of your testimony. That chart shows total Parcel Post volume of approximately 291.6 million pieces, whereas the Postal Service's Cost and Revenue Analysis report for FYI 997 shows total Parcel Post volume of approximately 236 million pieces.

- (a) Explain this discrepancy.**
- (b) Are the volume figures in your Chart H restated in any way to take into account the Postal Service's use in FYI998 of information from postage statements in estimating RPW volumes, rather than relying solely on the DRPW system for estimating Parcel Post volumes?**

ANSWER:

- (a) When the Postal Service updated its methodology for counting parcel post volume in the RPW system in 1999, the parcel post volume for FY 1997 that you have cited was also restated. The restated data are presented in Chart H on page 154 of my testimony.**
- (b) Yes. Please see my response to part (a) above.**

DECLARATION

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



(Signed)

4-3-00

(Date)

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.



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