

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 PLUNKETT TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T36-13-14)

The United States Postal Service hereby provides the responses of witness Plunkett to the following interrogatories of United Parcel Service: UPS/USPS-T36-13, filed on March 23, 2000, and UPS/USPS-T36-14, filed on March 31, 2000.

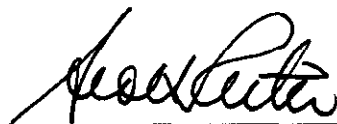
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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April 6, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORY OF UNITED PARCEL SERVICE

UPS/USPS-T36-13. Refer to page 14 and Attachment H of USPS-T-36. Explain in detail why an average machinable and non-machinable savings should be applied in creating DDU rates when a surcharge is proposed to be applied to non-machinable DBMC parcels.

UPS/USPS-T36-13 Response.

The decision to employ an average was based on the lack of empirical data with which to make informed assumptions regarding the proportion of non-machinable parcels. I would also point out that the proportion of non-machinable DBMC parcels is 5.1 percent, which means that the effect of inclusion of these pieces is relatively small. Moreover, this effect is further mitigated by constraints imposed during the final stages of rate design.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE**

UPS/USPS-T36-14. Refer to your response to UPS/USPS-T36-12. Are OMAS revenue, pieces and weight included in the RPW data extracts provided in the Attachment your Plunkett response to UPS/USPS-T36-12? If so, in which category or categories are the OMAS data included?

UPS/USPS-T36-14 Response

The OMAS Parcel Post data are reported in the RPW report under the following

RPW Mail Category Codes:

4101 Agency Std B Inter-BMC Machinable Parcel Post

4102 Frank Std B Inter-BMC Machinable Parcel Post

4161 Agency Std B DBMC Parcel Post

4162 Frank Std B DBMC Parcel Post

DECLARATION

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

Michael K. Plunkett

Dated: 4/6/00

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 cursive script, appearing to read "Scott L. Reiter", is written above a solid horizontal line.

Scott L. Reiter

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