

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF POSTAL SERVICE WITNESS ROBINSON  
TO INTERROGATORY UPS/USPS-T34-35

The United States Postal Service hereby provides the responses of Postal Service witness Robinson to the following interrogatories of the United Parcel Service: UPS/USPS-T34-35, filed on March 23, 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

  
Richard T. Cooper

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(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBINSON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T34-35.** Interrogatory UPS/USPS-T34-4 asked about a statement in an analyst's report discussing the Postal Service's contract with Emery that Emery "has recognized \$123.7 million in unbilled revenue to date" in relation to the Priority Mail contract. In an objection filed at the Commission on February 25, 1999, the Postal Service advised that Emery's "unbilled revenue" under the contract is a "matter under discussion." As of the date of your answer, has the Postal Service agreed to pay Emery any amounts over and above the amounts which the Postal Service contended were to be paid under the PMPC contract, either with respect to BY1998, FY1999, FY2000, or FY2001? If so, provide those amounts for each year.

**RESPONSE:**

To the best of my knowledge, the Postal Service has not reached any such agreement with Emery.

**DECLARATION**

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

  
MAURA ROBINSON

Dated: 4.6.2000

## 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.

  
Richard T. Cooper

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