

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 INTERROGATORY OF
UNITED PARCEL SERVICE, AND RESPONSE OF UNITED STATES POSTAL
SERVICE TO THE IDENTICAL INTERROGATORY
(UPS/USPS-T5-188; UPS/USPS-2)
(April 12, 2000)

The United States Postal Service hereby provides the response of witness Hunter to the following interrogatory of United Parcel Service: UPS/USPS-T5-188, filed on March 29, 2000. The United States Postal Service also provides the institutional response to UPS/USPS-2, which embodies the identical question embodied in UPS/USPS-T5-188; the answer to the institutional response simply points to witness Hunter's response to UPS/USPS-T5-188.


The interrogatory is stated verbatim each time and is followed by the appropriate response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Kenneth N. Hollies

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

UPS/USPS-T5-88. Refer to the Postal Service's answer to interrogatory PSA/USPS-T32-8 (redirected to the Postal Service from witness Mayes), which (1) refers to "the change made in FY99 to use mailing statement data for RPW Parcel Post revenues and volumes, instead of the previously used sampling data," and (2) states that " This revision in data sources was applied to official FY1998 data."

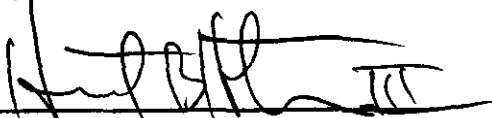
- (a) Did the "revision" that was "applied to official FY 1998 data" consist of developing factors or otherwise using data derived from FY 1999 mailing statements and then applying those factors or results to FY 1998 RPW data?
- (b) Was the "revision in data sources [that] was applied to official FY 1998 data" based on FY 1998 mailing statement data, or on FY 1999 mailing statement data?

RESPONSE.

- a-b. The Base Year 1998 estimates of RPW totals provided in Tables 1-3 of my testimony are based on FY 1998 postage statement data. No postage statement data for the FY 1999 period were used to construct or develop these estimates.

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 12, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES
OF UNITED PARCEL SERVICE

UPS/USPS-2. Refer to the Postal Service's answer to interrogatory PSA/USPS-T32-8 (redirected to the Postal Service from witness Mayes), which (1) refers to "the change made in FY99 to use mailing statement data for RPW Parcel Post revenues and volumes, instead of the previously used sampling data," and (2) states that " This revision in data sources was applied to official FY1998 data."


- (a) Did the "revision" that was "applied to official FY 1998 data" consist of developing factors or otherwise using data derived from FY 1999 mailing statements and then applying those factors or results to FY 1998 RPW data?
- (b) Was the "revision in data sources [that] was applied to official FY 1998 data" based on FY 1998 mailing statement data, or on FY 1999 mailing statement data?

RESPONSE.

a-b. See the response to UPS/USPS-T5-88.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents 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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