

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

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS MAYES TO INTERROGATORIES OF UNITED PARCEL SERVICE
(UPS/USPS-T32-12 AND 13)

The United States Postal Service hereby provides the responses of witness Mayes to the following interrogatories of United Parcel Service: UPS/USPS-T32-12 and 13 (filed on March 8, 2000).

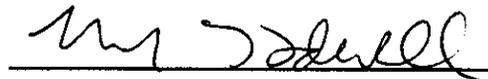
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
April 17, 2000

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

UPS/USPS-T32-12. Refer to USPS-32B, Page 1, as revised 2-18-00. Explain in detail the relationship between the Test Year After Rates Revenue shown for Parcel Post of \$1,200,362 thousand to the Test Year After Rates Revenue for Parcel Post of \$1,211,452,068 shown in Exhibit K of USPS-T-36 (Plunkett).

Response:

The two numbers should be the same, and should both be \$1,211,453,431, as shown in witness Plunkett's revised Attachment K, filed April 17, 2000.

RESPONSE OF POSTAL SERVICE WITNESS MAYES TO UPS INTERROGATORIES

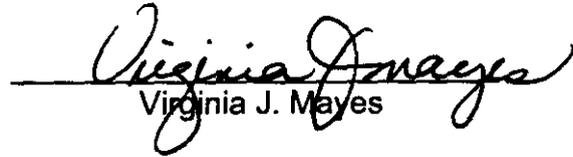
UPS/USPS-T32-13. Refer to USPS-32A, Page 1, as revised 2-18-00. Explain in detail the relationship between the Test Year Before Rates Revenue shown for Parcel Post of \$1,196,441 thousand to the Test Year Before Rates Revenue for Parcel Post of \$1,197,799,658 shown in Exhibit K of USPS-T-36 (Plunkett).

Response:

The two numbers should be the same, and should both be \$1,197,800,832, as shown in witness Plunkett's revised Attachment K, filed April 17, 2000.

DECLARATION

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

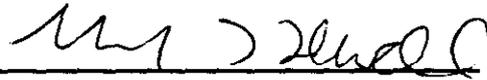

Virginia J. Mayes

Dated:

April 17, 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.



Michael T. Tidwell

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