

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 INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T5-89-90)

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of United Parcel Service: UPS/USPS-T5-89-90, filed on April 3, 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



Kenneth N. Hollies

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.



Kenneth N. Hollies

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April 3, 2000

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

UPS/USPS-T5-89. Refer to your response to interrogatory UPS/USPS-T5-29, which asked for "detailed tables for FY1998 in similar format [to Tables 1-3 of your testimony] by subclass for each mail class, including Inter-BMC, Intra-BMC, and DBMC revenue, piece, and weight estimates." Your response refers to files in the BRPW system which do not present that information without further analysis, and even then refers only to that portion of the estimates presented in Tables 1-3 which comes from the BRPW system (i.e., not including information from that portion of the estimates in Tables 1-3 which comes from the DRPW system). In order to reduce the scope of this request, you need not provide the requested breakdown for mail classes and subclasses other than Parcel Post. However, as requested, please provide Parcel Post revenue, pieces, and weight for FY1998, broken down by Inter-BMC, Intra-BMC, and DBMC, separately for (i) that portion of the information in Tables 1-3 of your testimony which comes from the DRPW system, and (ii) that portion of the information in Tables 1-3 of your testimony which comes from the BRPW system.

RESPONSE.

- i. See the response to UPS/USPS-T4-12(a).
- ii. The response to UPS/USPS-T5-29 provides sufficient detail to obtain the requested information. Nevertheless, for the permit imprint parcel post mail category, the three subcategories of Inter-BMC, Intra-BMC and DBMC also are identified by selecting records with RPWCODE values 4100, 4105 and 4160, respectively.

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

UPS/USPS-T5-90. Refer to your answer to interrogatory UPS/USPS-T5-27, which asked for "a copy of a report generated from the PERMIT system showing the total volume for Parcel Post separately for (i) Inter-BMC, (ii) Intra-BMC, and (iii) DBMC." Your response indicates that you "understand" that the PERMIT System reports "do not aggregate this information beyond the finance number level." However, you do not indicate that the PERMIT System reports cannot aggregate this information beyond the finance number level. Please provide the requested information aggregated beyond the finance number level.

RESPONSE. I understand that the PERMIT System reports cannot aggregate this information beyond the finance number level.

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 17, 2000