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BEFORE THE

POSTAL RATE COMMISSION 46 PH '00

WASHINGTON, D.C. 20268 0001 COMMISSION POSTAL FOR THE SEGRETARY OFFICE OF THE SEGRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

FURTHER RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER (USPS-T-35) TO QUESTION POSED BY THE OFFICE OF THE CONSUMER ADVOCATE AT APRIL 24, 2000 HEARING

The United States Postal Service hereby provides the further response of witness Moeller (USPS-T-35) to a question posed by the Office of the Consumer Advocate at the hearing for witness Moeller on April 24, 2000 (Tr. 10/4045-47). This supplements witness Moeller's initial response to a hearing question which was filed on April 28. The question is paraphrased and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony F. Alverto

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax -6187 May 17, 2000

FURTHER RESPONSE OF WITNESS MOELLER TO QUESTIONS POSED DURING HEARINGS

Question: Witness Moeller was asked for information regarding the weight per piece of pieces paying the Residual Shape Surcharge. (Tr.10/4079). Earlier in the cross-examination (Tr.10/4045-47), he was asked about the availability of FY99 data regarding the percentage of nonletters that were parcel-shaped, and a response to that request was filed on April 28, 2000. In that response, witness Moeller noted that revenue, pieces, and weight data specifically for pieces subject to the surcharge, by subclass, should be available in two weeks.

RESPONSE:

Pieces subject to the Residual Shape Surcharge – GFY99 (Surcharge implemented January 10, 1999)

SUBCLASS	Revenue	Pieces	Weight (pounds)	Ounces/piece
Regular	\$331,909,800	550,026,918	321,908,436	9.3642
ECR	\$1,792,267	7,653,424	1, 797,109	3.7570
Nonprofit	\$5,500,028	12,615,265	5,270,750	6.6849
NECR	\$54,909	301,627	98,792	5.2405

DECLARATION

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

JOSEPH D. MOELLER

Dated: 5/17/00

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.

Anthony F. Alverno

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