

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 EGGLESTON  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 11, QUESTION 4

The United States Postal Service hereby provides the response of witness Eggleston to Presiding Officer's Information Request No. 11, question 4. This response was not filed with the other questions at the time they were due, because witness Eggleston was out of the office during the pendency of that request. Upon her return, she immediately turned her attention to this question and it is hereby provided, with the question stated verbatim and with the witness's declaration.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Rate-making



Scott L. Reiter

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May 25, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 11**

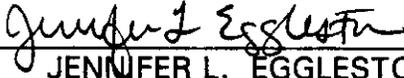
4. Refer to USPS-T-26, attachment Z. Please explain why the Christmas Network Line Haul and Christmas Network Excise Tax costs are treated differently than the Christmas Air Taxi Line Haul and Christmas Air Taxi Excise Tax costs. In particular, please explain why the network costs are not distance related while the air taxi costs are.

**RESPONSE:**

Please see my response to POIR No. 9, question 10 a. It is my understanding that Christmas Network Line Haul and Christmas Network Excise Tax costs are associated with a hub and spoke network. Since all parcels travelling on a hub and spoke network must pass through the hub regardless of their origin and destination, distance traveled, and therefore cost incurred, is not related to the origin and destination of the parcel. Therefore, these costs are treated as non-distance related in my testimony. It is also my understanding that Christmas Air Taxi Line Haul and Christmas Air Taxi Excise Tax costs are not associated with a hub and spoke network. Instead the distance traveled, and therefore the cost incurred, by the parcel is related to the distance between the origin and destination. Therefore these costs are treated as distance related in my testimony.

**DECLARATION**

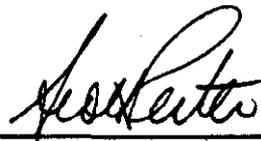
I, Jennifer Eggleston, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
JENNIFER L. EGGLESTON

Dated: 5/25/00

**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.



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Scott L. Reiter

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May 25, 2000