

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
REDIRECTED FROM WITNESS USPS
UPS/USPS-45-46, 49-50

The United States Postal Service hereby provides the responses of witness Hunter to the following interrogatories of United Parcel Service: UPS/USPS-45-46, 49-50, filed on July 26, 2000, and redirected from the Postal Service.

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

K N Hollies

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.

K N Hollies

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
August 9, 2000

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

UPS/USPS-45. Confirm that, in the PERMIT System for FY 1998, Standard Mail (A) mailpieces that paid Standard Mail (B) rates were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY 1998.

RESPONSE. Confirmed that mailpieces paid at Standard Mail (B) rates in the PERMIT System were counted as Standard Mail (B) in the PERMIT System.

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

UPS/USPS-46. Confirm that, in the PERMIT System for FY 1999, Standard Mail (A) mailpieces that paid Standard Mail (B) rates were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY 1999.

RESPONSE. See the response to UPS/USPS-45 which also applies to this interrogatory.

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

UPS/USPS-49. Confirm that, in the PERMIT System for FY 1998, pieces weighing less than one pound that would have qualified for Standard Mail (A) were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1998.

RESPONSE. Confirmed that a mailpiece weighing less than one pound and considered part of a Standard Mail (B) mailing was counted as Standard Mail (B) in the PERMIT System.

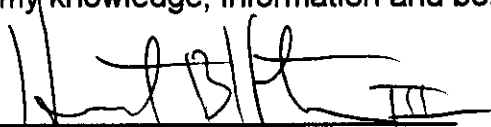
**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HUNTER
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-50. Confirm that, in the PERMIT System for FY 1999, pieces weighing less than one pound that would qualify for Standard Mail (A) were counted as Standard Mail (B) mailpieces. If you do not confirm, explain how such pieces were counted in the PERMIT System in FY1999.

RESPONSE. See the response to UPS/USPS-49 which also applies to this interrogatory.

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: 8/9/00