

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS PATELUNAS
(UPS/USPS-ST44-1-2)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-ST44-1-2, filed on July 31, 2000, and redirected from witness Patelunas.

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



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August 14, 2000

**Response of United States Postal Service
to Interrogatories of
United Parcel Service
(Redirected from witness Patelunas, USPS-ST44)**

UPS/USPS-ST44-1. Refer to Library Reference USPS-LR-I-429, Table 8.

- (a) Confirm that the final adjustments listed in Table 8 do not appear in the final adjustment column in Library Reference USPS-LR-I-424, Volume G, Table E.
- (b) Provide an explanation as to why these final adjustments are missing.
- (c) If there is an error in Table E, please file a revised Table E.

Response:

(a - c) The cited final adjustments were indeed missing from the "D" Reports of the PRC version. The revised "D" Reports associated with Table E, USPS-LR-I-424, Volumes C, E and G were filed as USPS-LR-I-442 on 8/2/00.

**Response of United States Postal Service
to Interrogatories of
United Parcel Service
(Redirected from witness Patelunas, USPS-ST44)**

UPS/USPS-ST44-2. Refer to Library Reference USPS-LR-I-424, Volume G, Table E.

- (a) Confirm that the calculations in the contingency column represent a 1% contingency.
- (b) Provide an explanation as to why the contingency is 1% and not 2.5%.

Response:

(a - b) The contingency amounts were incorrectly calculated at 1% in the "D" Reports of the PRC version. The revised "D" Reports with the correct 2.5% contingency are shown in Table E, USPS-LR-I-424, Volumes C, E and G were filed as USPS-LR-I-442 on 8/2/00.

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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", written over a horizontal line.

Susan M. Duchek

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