

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS BARON TO INTERROGATORY OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T17-1)

The United States Postal Service hereby provides the response of witness Baron to the following interrogatory of United Parcel Service: UPS/USPS-T17-1, filed on August 12, 1997. A signed declaration to accompany the response was not available; one will be filed shortly.

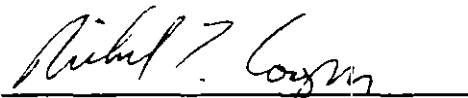
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2993; Fax -5402  
August 26, 1997

Response of Witness Baron to Interrogatory of United Parcel Service

**UPS/USPS-T17-1.** Please provide the number of new delivery addresses for each year from FY 1987 (or, if not available by fiscal year, by calendar year) up to and including FY 1996 (or calendar year 1996).

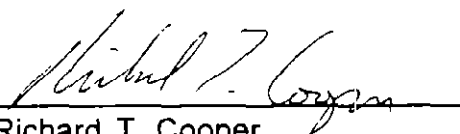
**RESPONSE:**

The following figures on possible delivery points are estimates reported in the Comprehensive Statement on Postal Operations for fiscal years 1987 through 1996. All figures are in millions.

FISCAL YEAR	CITY DELIVERIES	RURAL DELIVERIES	HIGHWAY CONTRACT DELIVERIES	POST OFFICE BOX POSSIBLE DELIVERIES
1987	76.2	18.6	1.1	Not Available
1988	77.2	19.3	1.1	17
1989	77.9	19.9	1.2	17
1990	78.1	20.7	1.3	17.9
1991	78.5	22	1.4	18.2
1992	78.9	22.5	1.4	18.8
1993	79.5	23.5	1.5	19
1994	80	23.6	1.5	20.2
1995	80.7	24.7	1.6	20.8
1996	81.1	25.5	1.6	19.6

## 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.

  
Richard T. Cooper

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