

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, 2001

Docket No. R2001-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS TAKIS TO INTERROGATORY OF UNITED PARCEL SERVICE
(UPS/USPS-T19-4) -- ERRATA

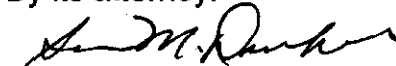
The United States Postal Service hereby provides the revised response of witness Takis to the following interrogatory of United Parcel Service: UPS/USPS-T19-4, filed on October 10, 2001. A partial objection to UPS/USPS-T19-4 was filed on October 22, 2001 and the initial response was filed on October 24, 2001. Subsequently, UPS and the Postal Service were able to reach a compromise solution on the objection, and the Postal Service is thus providing the attached revised response. Both UPS and the Postal Service have agreed that this answer will be deemed responsive to the interrogatory. UPS, however, reserves its right to follow up on the response and the Postal Service reserves its right to object to any such follow ups. In addition, if further *information on termination for convenience payments or settlements becomes available*, the Postal Service will further revise or supplement this response.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Susan M. Duchek

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November 20, 2001

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

UPS/USPS-T19-4. Provide all termination costs and any continuing costs that the Postal Service has or will incur separately for each of the following contracts: ANET, WNET, TNET, and the PMPC contract. If exact amounts are not available, provide the Postal Service's best available estimates of the termination costs for each contract.

UPS/USPS-T19-4 Response: A partial objection to this interrogatory was filed on October 22, 2001.

It is my understanding that the current aggregate "best available" estimate of termination for convenience costs for the ANET, WNET, and TNET contracts is \$226 million. It also is my understanding that the Postal Service has made a provisional payment of \$70 million on the ANET termination for convenience, against a cap of \$150 million for both termination for convenience and other ANET claims. Furthermore, I do not address PMPC contract termination costs in my testimony, and it is my understanding that no estimates for these termination costs are included in the Request. It is my understanding that the Postal Service has made a \$60 million provisional payment on the PMPC termination for convenience.

DECLARATION

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

W M Takis

Dated: 11/20/01

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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