

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268B0001

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KANEER TO INTERROGATORY OF DAVID B. POPKIN  
(DBP/USPS-155, REDIRECTED FROM THE POSTAL SERVICE)

The United States Postal Service hereby provides the response of witness Kaneer to the following interrogatory of David B. Popkin: DBP/USPS-155, filed on January 10, 2002, and redirected from the Postal Service.

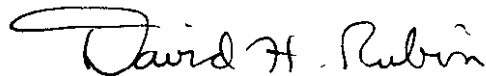
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
January 22, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KANEER  
TO INTERROGATORY OF DAVID B. POPKIN

**DBP/USPS-155** Please refer to your response to DBP/USPS-122 subpart c and d. [a] Please provide a copy of the referenced Publication 431. [b] The requested procedures also relates to the time period that the updates will be made, such as on an annual basis, prior to each omnibus rate case, etc. What time period is contemplated for updating the data?

**RESPONSE:**

- (a) Please see library reference J-216.
- (b) Again, no determinations have been made.

**DECLARATION**

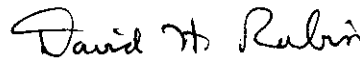
**I, Kirk T. Kaneer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.**

*Kirk T. Kaneer*

**Dated:** 01/22/02

**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.



\_\_\_\_\_  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
January 22, 2002