

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BANK ONE
CORPORATION

Docket No. MC2004-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS PLUNKETT
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-33-34)
(August 9, 2004)

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of Consumer Advocate: OCA/USPS-T1-33-34, filed on July 30, 2004.

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

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3089 Fax -5402
August 9, 2004

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-33. Please refer to the table below, entitled APPENDIX A, page 4, (REVISED BY OCA), which contains revisions to the Bank One Model at Appendix A, page 4 of your testimony. Please confirm that the table entitled APPENDIX A, page 4, (REVISED BY OCA) is an alternative presentation of the Bank One Model that separates various calculations in Appendix A at page 4 of your testimony. If you do not confirm, please explain and show all calculations.

RESPONSE: Confirmed that the calculations present a modified version of the calculations on page 4 of Appendix A to my testimony.

RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS PLUNKETT TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-34. Please refer to the table below, entitled APPENDIX A, page 5, (REVISED BY OCA), which contains revisions to the Bank One Model at Appendix A, page 5 of your testimony. Please confirm that the table entitled APPENDIX A, page 5, (REVISED BY OCA) is an alternative presentation of the Bank One Model that separates various calculations in Appendix A at page 5 of your testimony. If you do not confirm, please explain and show all calculations.

RESPONSE: Confirmed that the calculations present a modified version of the calculations on page 5 of Appendix A to my testimony.

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.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
August 9, 2004