

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

RECEIVED  
MAR 9 3 41 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE CLERK

**POSTAL RATE AND FEE CHANGES**

**DOCKET NO. R2000-1**

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE  
WITNESS GEORGE S. TOLLEY (USPS-T6-1)**

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



---

Timothy J. May, Esquire  
Patton Boggs LLP  
2550 M Street, NW  
Washington, DC 20037-1350  
Tel. 202/457-6050  
Fax: 202/457-6315

Counsel for Parcel Shippers Association

Dated: March 8, 2000

**INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE WITNESS TOLLEY**

**PSA/USPS-T6-1**

On page 157 of your testimony you state that, in 1998, Federal Express, United Parcel Service, and Parcel Post combined accounted for over 90% of the “domestic package market.”

(a) Please provide the total number of packages, and the number of the packages carried by each of the three that, combined, equal 90% of the “domestic package market.”

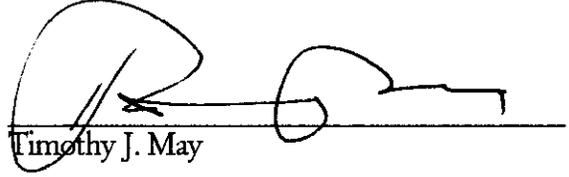
(b) In computing that statistic, did you include Standard (A) Parcels (under 1 pound), and what the Postal Service regards as the parcel component of Priority Mail?

(c) If the answer to (b) is in the negative, please explain why you have excluded the Standard (A) and Priority Mail Parcels from your calculation.

(d) If the answer to (b) is in the negative, please supply the Postal Service's share of the “domestic package market” if the package market is defined to include packages meeting the definition of Standard (A) Parcels (under 1 pound) and Priority Mail Parcels.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



Timothy J. May

Dated: March 8, 2000