

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

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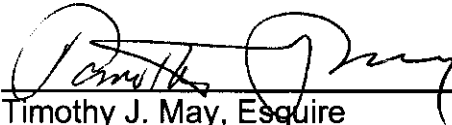
POSTAL RATE AND FEE CHANGES

DOCKET NO. R2000-1

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER L. EGGLESTON (USPS-T26-4)**

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,



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Dated: March 8, 2000

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TO UNITED STATES POSTAL SERVICE WITNESS EGGLESTON**

PSA/USPS-T26-4

1. Please refer to page 377 of LR-I-105.

(a) Please confirm that the average cubic feet per piece for an oversized parcel is 10.84 and that this figure can be calculated by dividing the column total for "Total Oversized Cubic Feet" by the column total for "Oversized Volume." If not confirmed, what is the average cubic feet per oversized parcel?

(b) Please confirm that the data on page 377 were developed using RPW data for FY 1999, PQ 3. If not confirmed, please provide the source of the data.

(c) Please provide the coefficient of variation for each figure in the "Oversized Volume" column and in the "Total Oversized Cubic Feet" column of the table on page 377.

(d) For each figure in the "Total Oversized Cubic Feet" column, please identify the size of sample that underlies it.

(e) Please confirm that the figures on this page were developed using only data for Parcel Post oversized parcels. If not confirmed, please explain.

(f) Does the Postal Service's RPW system collect data on the cubic feet of individual pieces or were the total oversized cubic feet figures developed using conversion factors?

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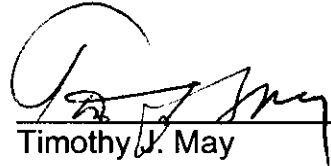
(i) If the Postal Service's RPW system does collect data on the cubic feet of pieces, please provide a description of how the Postal Service collects these data and for what types of mail the Postal Service collects these data.

(ii) If the Postal Service's RPW system doesn't collect data on the cubic feet of mail pieces, please provide a description of how the Postal Service calculated the "Total Oversized Cubic Feet" figures on page 377.

(g) Please provide citations to all places in your testimony and attachments where you reference the 10.84 cubic feet per piece for an oversized parcel.

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