

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

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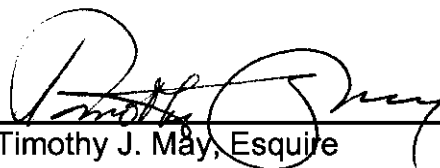
**POSTAL RATE AND FEE CHANGES**

**DOCKET NO. R2000-1**

**THIRD INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE  
WITNESS JENNIFER L. EGGLESTON (USPS-T26-5)**

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 16, 2000

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

**PSA/USPS-T26-5**

Please refer to lines 12-14 on page 8 of your testimony, where you state, "The cost difference between an inter-BMC machinable parcel and an intra-BMC machinable parcel is calculated in Table 3 on the same page. The estimated cost difference is 32.8 cents." Further, please refer to lines 24-27 on page 16 of your testimony, where you state, "The estimated cost savings for a DSCF parcel is calculated separately for a NMO and a machinable parcel. Then the proportion of machinable and the proportion of NMO parcels are used to calculate a weighted average of the cost savings." Finally, please refer to page 1 of Attachment A to your testimony and page 1 of Attachment H of USPS-T-36.

(a) Please confirm that the Inter-BMC NMO mail processing unit cost is \$3.489 and that the Intra-BMC NMO mail processing unit cost is \$2.544. If not confirmed, please provide the correct unit cost figures.

(b) Please confirm that the intra-BMC NMO cost difference is 94.5 cents. If not confirmed, please provide the correct cost difference figure.

(c) Please confirm that 7.986 percent of intra-BMC parcels are NMOs. If not confirmed, please provide the correct percentage.

(d) Please confirm that using "the proportion of machinable and the proportion of NMO parcels...to calculate a weighted average of the cost savings" results in an intra-BMC cost difference of 37.7 cents. If not confirmed, please provide the correct cost difference figure.

## 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.

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Timothy J. May

Dated: March 16, 2000