

DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS EGGLESTON TO INTERROGATORY OF  
THE PARCEL SHIPPERS ASSOCIATION  
(PSA/USPS-T26-4)

The United States Postal Service hereby provides the responses of witness Eggleston to the following interrogatory of the Parcel Shippers Association: PSA/USPS-T26-4, filed on March 8, 2000.

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



Scott L. Reiter

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March 22, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON TO  
INTERROGATORY OF THE PARCEL SHIPPERS ASSOCIATION**

**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?

(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.

**RESPONSE:**

(a) An error was found in the data file. The average cube of an oversize parcel in PQ3, FY99 is 8.04. Errata is being filed to both LR-I-105 and USPS-T-26.

(b) Confirmed.

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(c & d) The following table summarizes the coefficient of variations and sample size.

	<b>Coefficient of Variation</b>		<b>Sample Size</b>
	<b>Total Oversized Volume</b>	<b>Total Oversized Cubic Feet</b>	
<b>DBMC</b>	44.30 %	54.50 %	47
<b>Inter-BMC</b>	70.68 %	52.84 %	12
<b>Intra-BMC</b>	47.99 %	70.54 %	5

(e) Confirmed

(f) The Postal Service's RPW system collects data on the cubic feet of individual parcels for only Parcel Post parcels.

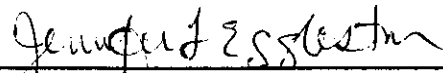
(i) This information is provided on pages 3-113 to 3-264 of USPS LR-I-37, Handbook F-75.

(ii). N/A.

(g) The only citation for the average cube of oversize parcels in my testimony is Attachment A, page 6, column 15. The impact of changing the average cube will flow through all oversize mailflow models in my testimony. Errata is being filed.

**DECLARATION**

I, Jennifer Eggleston, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
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JENNIFER L. EGGLESTON

Dated: 3/22/00

**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.



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Scott L. Reiter

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March 22, 2000