

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

MOTION OF UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE  
OF INTERROGATORY RESPONSES OF WITNESS EGGLESTON  
(CSA/USPS-T39-3 AND 6)

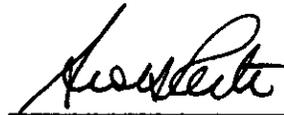
The United States Postal Service hereby moves that the following interrogatory answers of witness Eggleston be accepted one day late: CSA/USPS-T39-3 and 6, redirected from witness Mayo. The delay was caused by an oversight in the redirection process.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

**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.



Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
April 5, 2000

BEFORE THE  
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RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS EGGLESTON TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T26-21-23)

The United States Postal Service hereby provides the responses of witness Eggleston to the following interrogatories of United Parcel Service: UPS/USPS-T26-21-23, filed on March 22, 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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April 5, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T26-21.** Refer to your response to UPS/USPS-T26-9(a). On page 5 of the MTAC Annual report, the MAIL.DAT system is discussed. Provide all available information with respect to the MAIL.DAT system, including, but not limited to, reports issued by the DirectLink/MAIL.DAT work group, and minutes of any meetings.

**RESPONSE:**

It is my understanding that MAIL.DAT is a product owned by Graphic Communications Association (GCA). Therefore, all questions about the product should be directed to them.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-126-22.** Refer to your responses to UPS/USPS-T26-10 through 15.

(a) Confirm that acceptance costs for plant-verified DBMC parcels entered at the BMC are contained in the BMC platform cost pool. If not confirmed, explain in detail.

(b) Confirm that those intra-BMC and inter-BMC Parcel Post pieces that are entered at the window do not incur verification or acceptance costs. If not confirmed, explain in detail.

(c) What was the volume of intra-BMC Parcel Post entered at the window (i.e., not entered in bulk at the platform) in FY1998?

(d) What was the volume of inter-BMC Parcel Post entered at the window (i.e., not entered in bulk at the platform) in FY1998?

**RESPONSE:**

(a) There may be some confusion about the terms "acceptance" and "verification." I have been told that there is no set definition for which part of the plant-verified dropship system is considered "acceptance" and which part is considered "verification". The words are interchangeable. By definition, plant-verified mail is accepted/verified at the mailer's plant (mail is checked to see if the 8125 is correct), and; therefore these costs are not included in the BMC platform cost pool. Plant-verified mail is also accepted/verified at the BMC (mail is double-checked to ensure the parcels match what is written down on the form 8125). These costs are included in the BMC platform cost pool.

(b) Confirmed that parcels entered over the window do not incur any additional acceptance or verification costs over the incurred window acceptance costs.

(c) To the best of my knowledge, these data are not available.

(d) To the best of my knowledge, these data are not available

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

**UPS/USPS-T26-23.** Refer to USPS-T-26, Attachment X. Describe in general terms how the results shown in this Attachment are used in the analysis or projection of Parcel Post costs.

**RESPONSE:**

The cost reductions calculated in Attachment X (page 2, rows 13 and 21) of my testimony are used by Witness Kashani as cost reductions due to the shift in Parcel Post towards more dropship. It is my understanding that these savings are distributed to Mail Processing component in cost segment 3 (USPS-T-14, Workpaper I, Volume 1 of 2, page 201) and Highway component in cost segment 14 (USPS-T-14, Workpaper I, Volume 1 of 2, page 559).

**DECLARATION**

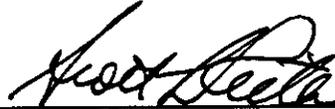
I, Jennifer Eggleston, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
JENNIEER L. EGGLESTON

Dated: 4/5/00

**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.



\_\_\_\_\_  
Scott L. Reiter

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Washington, D.C. 20260-1137  
April 5, 2000