

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 INTERROGATORIES OF
THE CONTINUITY SHIPPERS ASSOCIATION
REDIRECTED FROM WITNESS MAYO
(CSA/USPS-T39-3 & 6)

The United States Postal Service hereby provides the responses of witness Eggleston to the following interrogatories of the Continuity Shippers Association: CSA/USPS-T39-3 & 6, filed on March 21, 2000, and redirected from witness Mayo.

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 POSTAL SERVICE WITNESS EGGLESTON TO
INTERROGATORIES OF CONTINUITY SHIPPERS ASSOCIATION
REDIRECTED FROM WITNESS MAYO**

CSA/USPS-T39-3. Should the BPRS accounting fee be affected by the fact that half of the mailers perform the postage due function and the Postal Service only has to audit the work (and the costs of auditing are included in the BPRS per piece fee)? If not, why not.

RESPONSE:

The postage due unit cost calculated in Attachment W of my testimony includes the following activities: sorting the parcels and either calculating or auditing postage due. It is my understanding that the activities underlying the accounting fee are activities associated with maintaining and debiting the customer's account. It is further my understanding that even when a mailer calculates postage due, the Postal Service still has the responsibility of maintaining and debiting the customer's account. Therefore, the BPRS accounting fee should not be affected by the fact that half of the BPRS mailers perform the postage due function.

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CSA/USPS-T39-6. Please confirm that the machinability requirement for BPRS parcels reduces the costs of processing BPRS parcels. If you do not confirm, please explain.

RESPONSE:

Confirmed that, holding all else equal, machinable parcels are less costly to handle than nonmachinable parcels.

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.

Jennifer L. Eggleston

JENNIFER 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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