

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

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE PARCEL SHIPPERS ASSOCIATION WITNESS KARLS  
(USPS/PSA-T2-1-4)

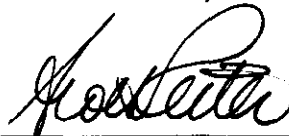
*Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Parcel Shippers Association witness Karls: USPS/PSA-T2-1-4.*

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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May 31, 2000

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

**USPS/PSA-T2-1.** The following questions refer to the methodology used to derive the average cube of Fingerhut's oversize parcels (6.03).

- a. Was a sample used to calculate this average cube? If yes, please explain what methodology you used to ensure the randomness of the sample.
- b. Over what period of time was the average cube of 6.03 calculated?
- c. Exactly how was cube calculated? Was each parcel measured individually? Please explain all steps in the process including any assumptions that were used.
- d. Please supply all the raw data used to calculate the average cube of 6.03.

**USPS/PSA-T2-2.** The following questions refer to the methodology used to derive the average cube of CTC's oversize parcels (5.6).

- a. Was a sample used to calculate this average cube? If yes, please explain what methodology you used to ensure the randomness of the sample.
- b. Over what period of time was the average cube of 5.6 calculated?
- c. Exactly how was cube calculated? Was each parcel measured individually? Please explain all steps in the process including any assumptions that were used.
- d. Please supply all the raw data used to calculate the average cube of 5.6.

**USPS/PSA-T2-3.** Do you have any data on the average oversize cube of other mailers besides FingerHut and CTC? If so, please provide those data.

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

**USPS/PSA-T2-4.** Please present the data in PSA Exhibit T2-1 (described in the testimony as "Exhibit A") by weight increment. Also, please provide the CTC data referred to in your testimony by weight increment. If this is not available, please provide the number of 108-130 inch length plus girth pieces weighing under 70 pounds and the number of 108-130 length plus girth pieces weighing over 70 pounds for both your data and the CTC data.

## 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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written in a cursive style.

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Scott L. Reiter

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