

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 ZIMMERMANN
(USPS/PSA-T1-1-5)

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 Zimmermann: USPS/PSA-T1-1-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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June 16, 2000

USPS/PSA-T1-1. Please see your testimony at page 11, lines 21-22 where you acknowledge that in some instances, Parcel Post rates are advantageous to UPS residential rates. Is it your belief that the proposed Standard Mail (A) rates are usually always more advantageous than UPS residential rates?

USPS/PSA-T1-2. Please see your testimony at page 15, lines 5-6. If Standard A parcels were a subclass, would the rates have to cover the costs?

USPS/PSA-T1-3. Please see your testimony at page 16, lines 8-10. Is it your position that rates only fail to be fair and equitable if someone complains about them?

USPS/PSA-T1-4. Please see your testimony at page 16, lines 11-14.

(a) Are all mailers of letters and flats in Standard Mail (A) members of PSA?

(b) Do all mailers of letters and flats in Standard Mail (A) also mail parcels?

USPS/PSA-T1-5. Please see your testimony at page 17, line 21, through page 18, line 9. Is it your testimony that the revenues for Regular parcels will exceed the cost of parcels in the test year? If so, please provide your estimate of the unit revenue and unit cost for these parcels.

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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