

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
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
THE PARCEL SHIPPERS ASSOCIATION WITNESS KARLS
(USPS/PSA-T2-5)

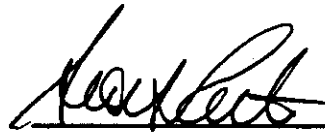
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatory and request for production of documents to the Parcel Shippers Association witness Karls: USPS/PSA-T2-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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June 21, 2000

USPS/PSA-T2-5. Please refer to your response to USPS/PSA-T2-1(c). Please explain what you mean by "one unit of each product code is measured during the receiving process. Each receiving unit requires a new measurement."

(a) Please define the term "unit."

(b) Please define the term "product code."

(c) Please define the term "receiving."

(d) Please explain if each and every oversize parcel was measured. If one parcel is measured out of each type of parcel, please explain the level of confidence that all parcels of each type have the same measurements. If one only one parcel of each type of parcel is measured, please explain if the average cube is a weighted average.

(e) Please explain which parcels you included in the oversize cube calculation: all parcels with measurements of length plus girth over 108 inches but not exceeding 130 inches, or parcels that definitely paid the oversize surcharge? If one method was picked over the other, please explain any differences between the two.

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", is written above a solid horizontal line.

Scott L. Reiter

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