

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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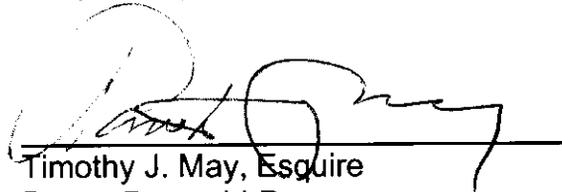
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

**PARCEL SHIPPERS ASSOCIATION (PSA)
FIRST INTERROGATORIES TO THE UNITED PARCEL SERVICE
SUPPLEMENTAL WITNESS SELICK (UPS-ST-1)**

The Parcel Shippers Association (PSA) requests United Parcel Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,



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Counsel for Parcel Shippers Association

Dated: August 21, 2000

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED PARCEL SERVICE SUPPLEMENTAL WITNESS SELICK**

PSA/UPS-ST-1

Please refer to page 5 of your Supplemental Testimony where you state: "More nonsensical records have been identified in the disaggregated data than were revealed by an analysis of the aggregated data. Only 73 of 555 records which failed the Postal Service's very broad 'revenue tolerance' test when applied to the disaggregated data could be detected at the aggregated level." Please complete the attached Tables 1 and 2 using data from USPS-LR-I-401.

Table 1. Nonsensical Records and Total Records From Permit Imprint Parcel Post Data Extract

		Number of Records	Number of Pieces	Total Revenue
Nonsensical	[1]	555		
Total	[2]			
Percentage Nonsensical	[3]=[1]/[2]			

Table 2. Nonsensical and Not Detected by Revenue Tolerance Test Records and Total Records From Extract

		Number of Records	Number of Pieces	Total Revenue
Nonsensical and Not Detected by Revenue Tolerance Test	[4]	482		
Total	[5]			
Percentage Nonsensical and Not Detected by Revenue Tolerance Test	[6]=[4]/[5]			

PSA/UPS-ST-2

Please confirm the following statements. If you are unable to confirm, please supply an explanation.

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
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(a) Please confirm that Parcel Post single-piece mail would generally be counted in DRPW, not BRPW, because BRPW only counts permit imprint pieces.

(b) Please confirm that the Standard (A) Single-Piece subclass was eliminated with the implementation of Docket No. R97-1 rates.

(c) Please confirm that after the implementation of Docket No. R97-1 rates, no Standard (A) rate was higher than any Parcel Post rate. Ratefold (Notice 123).

[Highest Standard (A) Mail rate is one-pound Basic, Nonautomation, No Destination Entry nonletter. This rate is 84.1 cents (16.4 cents + 67.7 cents). Lowest Parcel Post rate is \$1.21 for 2-pound, DDU parcel.]

(d) Please confirm that after the implementation of Docket No. R97-1 rates, Standard (A) Mail could not be mailed at Parcel Post rates because Parcel Post rates are higher than Standard (A) rates. DMM 54 Section E612.4.6.

(e) Please confirm that before the implementation of Docket No. R97-1 rates, no bulk Standard (A) rate was higher than any Parcel Post rate. DMM 52 Section R600.

[Highest bulk Standard (A) rate was 84.3 cents (16.6 cents + 67.7 cents) for one-pound Basic, Nonautomation, No Destination Entry nonletter. Lowest Parcel Post rate was \$2.10 for 2-pound, DBMC Zone 1&2 parcel.]

(f) Please confirm that in GFY 1999 there were only 42 million pieces of Standard (A) Single-Piece mail. (GFY 1999 RPW Report)

(g) Please confirm that the average revenue per piece in GFY 1999 for Standard (A) Single-Piece mail was approximately 81 cents. (GFY 1999 RPW Report)

(h) Please confirm that the lowest pre-R97-1 inter-BMC rate for a Standard (B) Parcel Post parcel was \$2.63. DMM 52 Section R600.6.1.

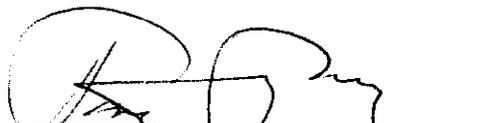
**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
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(i) Please confirm that the lowest pre-R97-1 intra-BMC rate for a Standard (B) Parcel Post parcel was \$2.24. DMM 52 Section R600.6.3.

(j) Please confirm that the average revenue per piece for Standard (A) Single-Piece mail in GFY 1999 was less than half of the lowest pre-R97-1 implementation Parcel Post single-piece rate.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the Postal Service by hand and by First-Class Mail upon all participants in this proceeding requesting such service.



Timothy J. May

Dated: August 21, 2000