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**POSTAL RATE COMMISSION**  
**WASHINGTON, D.C. 20268-0004**

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**POSTAL RATE AND FEE CHANGES, 2001**

**Docket No. R2001-1**

**INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS SCHENK  
(POSTCOM/USPS-T-43-1-3)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Schenk: PostCom/USPS-T-43-1-3.

Respectfully submitted,

*Ian Volner*

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Counsel for Association for Postal Commerce

October 10, 2001

## **Schenk Interrogatories**

1. Please refer to LR58adj.xls, worksheet Table 6. Please provide a revision to this spreadsheet based only on the Standard Regular subclass.
2. Please refer to LR58areg.xls, worksheet 3CREG Parcels (combined) and USPS-LR-I-92 from Docket No. R2000-1.
  - a. Please confirm that the parcel volume estimates on LR58areg.xls, worksheet 3CREG Parcels (combined) only include pieces that pay the residual shape surcharge. If not confirmed, please explain fully.
  - b. Please reproduce (in an electronic spreadsheet format) rows 3-6 of LR58areg.xls, worksheet 3CREG Parcels for Standard Regular parcels that are prepared as automation flats. Please identify the source of your data.
  - c. Please confirm that the source of Standard parcel volumes that you use in your analysis is Standard mailing statements. If not confirmed, please explain fully.
  - d. Please confirm that the source of Standard parcel mail processing costs is a combination of IOCS and MODS. If not confirmed, please explain fully.
  - e. Please confirm that LR58areg.xls, 3CREG Parcels (combined) includes Standard Regular and Standard Nonprofit parcels. If confirmed, please provide a version of LR58areg.xls, 3CREG Parcels (combined) individually for Standard Regular parcels and Standard Nonprofit parcels.
  - f. Please confirm that the Test Year unit cost for 3 to 5 ounce parcels estimated in LR58areg.xls is \$2.685. If not confirmed, please explain fully.
  - g. Please confirm that the Test Year unit cost for 3 to 5 ounce parcels estimated in Docket No. R2000-1, USPS-LR-I-92 was \$1.330. If not confirmed, please explain fully.
  - h. Has the Postal Service or any of its contractors performed any analysis to determine why the cost for 3 to 5 ounce parcels estimated in this case is so much higher than estimated in Docket No. R2000-1. If so, please provide a copy of each analysis.
  - i. Please describe any significant changes in the costing methodologies that the Postal Service used to estimate the unit cost for Standard Regular parcels by weight increment and estimate the impact that each significant change would have on the unit cost for 3 to 5 ounce Standard Regular parcels.

- j. Please confirm that the Test Year unit cost in LR59areg.xls for all Standard Regular parcels is \$1.025.
- k. Has the Postal Service or any of its contractors performed any analysis to determine why the cost for 3 to 5 ounce parcels is so much higher than the subclass average for parcels? If so, please provide a copy of each analysis.
- l. Please provide a detailed description of the characteristics (including dropship patterns, presort patterns, and content) of 3 to 5 ounce Standard Regular parcels.
- m. What is the coefficient of variation on the Test Year mail processing cost estimate for Standard Regular parcels weighing between 3 and 5 ounces?
- n. What is the coefficient of variation on Test Year total cost estimate for Standard Regular parcels weighing between 3 and 5 ounces?
- o. Please provide documentation on how the In-Office Cost System (IOCS) defines a flat, an automation flat, a parcel, and an IPP.
- p. Please provide documentation on how the Domestic Mail Manual defines a flat, an automation flat, a parcel, and an IPP.
- q. Please provide documentation on how the Standard Regular mailing statement defines a flat, an automation flat, a parcel, and an IPP.
- r. Please provide documentation on how the Postal Service's Revenue, Pieces, and Weight system for Standard Mail defines a flat, an automation flat, a parcel, and an IPP.
3. Please refer to LR58aECR.xls, worksheet 3CREG Parcels (combined).
- a. What is the coefficient of variation on the Test Year mail processing cost estimate for Standard ECR parcels?
- b. What is the coefficient of variation on the Test Year total cost estimate for Standard ECR parcels?
- c. Please describe the mail characteristics (in particular the contents of) Standard ECR parcels.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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