

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111

POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER L. EGGLESTON (USPS-T25)

The Parcel Shippers Association (PSA) requests United States Postal 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: October 25, 2001

PSA/USPS-T25-1. Please refer to Table 1 below.

Table 1. DBMC Intermediate Transportation Costs

Zone	TYAR DBMC Intermediate Transportation Cost Per Cubic Foot		
	R2000-1	R2001 -1	% Difference
		[2]	[3]=[2]/[1]-1
Zone 1-2	\$0.3255	\$0.590	81.3%
Zone 3	\$1.0891	\$2.100	92.9%
Zone 4	\$1.5737	\$3.433	118.2%
Zone 5	\$4.3843	\$7.116	62.3%
[1] Docket No. R2000-1, USPS-T-26, Attachment N, Page 1			
[2] USPS-I-R-J-64, 2ptran.xls, worksheet Cost-Sum			

- (a) Please confirm that all of the figures in Table 1 are correct. If not confirmed, please provide the correct figures.
- (b) Please confirm that the Docket No. R2000-1 figures in Table 1 were developed using an FY 1998 Base Year and an FY 2001 Test Year. If not confirmed, please explain fully.
- (c) Please confirm that the Docket No. R2001-1 figures in Table 1 were developed using an FY 2000 Base Year and an FY 2003 Test Year. If not confirmed, please explain fully.
- (d) Please explain in detail why TYAR DBMC Intermediate Transportation Costs Per Cubic Foot increased so significantly from the figures you presented in your Docket No. R2000-1 testimony to those in USPS-LR-J-64. In responding to this interrogatory, please discuss methodological changes, changes in input data, changes in the composition of Parcel Post transportation, and any other relevant changes.

PSA/USPS-T25-2. Please refer to Table 2 below.

Table 2. Inter-BMC Long Distance Zone-Related Costs

TYAR Inter-BMC Long Distance Zone-Related Cost Per Cubic Foot			
Zone	R2000-1	R2001-1	% Difference
		[2]	[3]=[2]/[1]-1
1-2	\$0.4898	\$0.3823	-22.0%
3	\$1.0725	\$0.8153	-24.0%
4	\$1.9476	\$1.5262	-21.6%
5	\$3.5758	\$2.5710	-28.1%
6	\$5.2686	\$3.7549	-28.7%
7	\$6.8505	\$5.0835	-25.8%
8	\$10.1262	\$8.2320	-18.7%
[1] Docket No. R2000-1, USPS-T-26, Attachment N, Page 1			
[2] USPS-LR-J-64, 2ptran.xls, worksheet Cost-Sum			

- (a) Please confirm that all of the figures in Table 2 are correct. If not confirmed, please provide the correct figures.
- (b) Please confirm that the Docket No. R2000-1 figures in Table 2 were developed using an FY 1998 Base Year and an FY 2001 Test Year. If not confirmed, please explain fully.
- (c) Please confirm that the Docket No. R2001-1 figures in Table 2 were developed using an FY 2000 Base Year and an FY 2003 Test Year. If not confirmed, please explain fully.
- (d) Please explain in detail why TYAR Inter-BMC Long Distance Zone-Related Transportation Costs Per Cubic Foot decreased so significantly from the figures you presented in your Docket No. R2000-1 testimony to those in USPS-LR-J-64. In responding to this interrogatory, please discuss methodological changes, changes in input data, changes in the composition of Parcel Post transportation, and any other relevant changes.

PSA/USPS-T25-3. Please refer to USPS-LR-J-64, 2ptran.xls, worksheet Cost-dist.1

- (a) Please confirm that you distributed \$34 million or 55 per cent of total inter-BMC highway transportation costs to intermediate transportation. If not confirmed, please explain fully.
- (b) Please confirm that intermediate transportation costs are distributed to DBMC, intra-BMC, and inter-BMC parcels. If not confirmed, please explain fully.
- (c) Please explain why it is appropriate to distribute inter-BMC highway transportation costs to DBMC parcels.
- (d) Please describe in detail the method that you used to divide inter-BMC highway transportation costs into intermediate transportation costs and long-distance transportation costs and provide all input data and underlying calculations in an electronic spreadsheet format.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served six (6) copies of the foregoing document upon the United States Postal Service by hand and by First Class Mail upon all participants in this proceeding requesting such service.

Dated: October 25, 2001



TIMOTHY J. MAY