

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

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS JENNIFER L. EGGLESTON TO INTERROGATORIES OF  
ASSOCIATION FOR POSTAL COMMERCE  
(POSTCOM/USPS-T33-4(e), (f), REDIRECTED FROM WITNESS JAMES M. KIEFER)

The United States Postal Service hereby files the response of witness Jennifer L. Eggleston to the following interrogatories of the Association for Postal Commerce: POSTCOM/USPS-T33-4(e), (f), filed on October 11, 2001, and redirected from witness James M. Kiefer.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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October 25, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON  
TO INTEROGATORIES OF ASSOCIATION OF POSTAL COMMERCE (POSTCOM)  
REDIRECTED FROM WITNESS KIEFER

**POSTCOM/USPS-T33-4.** Please refer to SWP3.1 [from USPS-LR-J-106]

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e. Has the Postal Service or any of its contractors estimated the cost savings that will result from the shift in BPM dropship patterns that resulted from the implementation of Docket No. R2000-1 rates? If so, please provide a copy of each analysis. If not, please provide you[r] best guess as to how much these changes in dropship patterns will reduce TYAR BPM costs.

f. Has the Postal Service or any of its contractors performed any adjustments to Test Year BPM costs to reflect the savings that will result from increased dropshipping? If so, please provide a citation to where the Postal Service made the adjustment.

**Response:**

(e) No. There are no data available to estimate the shift in BPM dropship patterns that has resulted or will result from the implementation of Docket No. R2000-1 rates.

Therefore, there is no data available to estimate the potential cost changes, or even the direction of the potential cost changes, that would result from a shift in BPM dropship patterns due to the implementation of Docket No. R2000-1 rates.

(f) No. Please see the answer to part (e) above. Since there were no data to show that there will be any significant change in costs (either a cost savings or an increase in costs), no one has calculated a test year cost adjustment.

## 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.

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Brian M. Reimer

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