

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

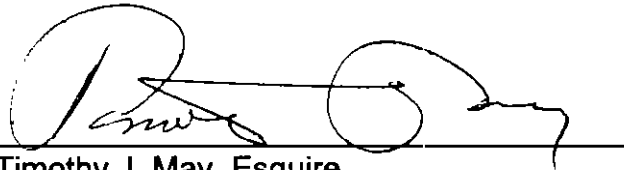
POSTAL RATE AND FEE CHANGES, 1997 :

DOCKET NO. R97-1

INTERROGATORIES
OF
PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JOSEPH D. MOELLER (USPS-T-36)

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: August 18, 1997

INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE WITNESS MOELLER

PSA/USPS-T36-1. With respect to your testimony on page 10, you seem to be saying that flats recoup some of the benefit of the residual surcharge which accrues to letters by reason of the fact that the letter/nonletter cost differential pass-through is smaller, and conversely that while letters do share the benefits of the surcharge, the amount of that benefit is offset by virtue of the lower shape differential than would otherwise be proposed between letters and non-letters. Please supply the pass-through you believe would be appropriate to reflect the difference in letters/non-letters, and the corresponding rates that would result, were you not to propose nor the Commission recommend a surcharge for Standard A parcels.

PSA/USPS-T36-2. Without a Standard (A) parcel surcharge, is it not the case that you would not increase the letter/flat cost differential pass-through in any event, because the percentage increase for the category already receiving the highest increase in the proposed rates, minimum per piece 3/5 digit presorted automation flats, as you say at pp. 10 and 11, would be even higher?

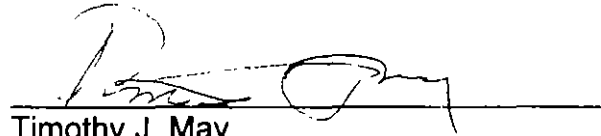
PSA/USPS-T36-3. You state that the surcharge applies to pieces "that are not letter or flat-shaped. It is expected that most pieces subject to the surcharge would be parcel-shaped." (page 11) "Most" implies "some" are not parcel-shaped. If the pieces are not letter-shaped, nor flat-shaped, nor parcel-shaped, what kind of shape would they have?

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PSA/USPS-T36-4. With respect to the table you present on page 46, Test Year 1998 Financial Summary, please further break down the categories of regular and ECR mail to show separately the information for regular letters, regular flats, and regular residual shape, regular ECR, regular ECR flats, and regular ECR residual shape.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



Timothy J. May

Dated: August 18, 1997