

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

RECEIVED  
Aug 18 12 03 PM '97  
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 VIRGINIA J. MAYES (USPS-T-37)

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,



Timothy J. May, Esquire  
PATTON BOGGS, L.L.P.  
2550 M Street, N.W.  
Washington, D.C. 20037-1350  
Tel. (202) 457-6050  
Fax. (202) 457-6315

Counsel for Parcel Shippers Association

Dated: August 18, 1997

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

**PSA/USPS-T37-1.** Since the stop loss 70 pound rate will be applied to parcels exceeding 108 inches so as "to begin recovering the additional transportation and handling costs that these pieces will incur," please explain why it is still necessary to limit the number of parcels exceeding 108 inches in any mailing to no more than 10% of the mailing.

**PSA/USPS-T37-2.** Will Standard A parcels be sorted on BMC parcel sorters equipped with barcode readers? If the answer is in the affirmative, please explain why those parcels will not be eligible to receive the 4 cents per piece discount offered to parcel post parcels.

**PSA/USPS-T37-3.** At the conclusion of your testimony you reproduce five tables indicating the proposed parcel post rates by each rate category and zone. For each table, please provide an estimate of the amount of volume the Postal Service anticipates will be realized for each rate cell in each table for the Test Year.

**PSA/USPS-T37-4.** Directing your attention to your responses to UPS/USPS-T37-6 (a) and (b):

(a) Please explain on what evidentiary basis you have confirmed the statements in those UPS questions?

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

(b) Since you do not currently carry parcels exceeding 108 inches in combined length and girth, how do you know what the weight of such parcels will be; and, therefore, how do you know that the rates for these parcels will not cover the costs?

(c) On what basis are you able to state that, in all events, for example, a 109 inch parcel in combined length and girth will not generate sufficient revenue at the 70 pound rate to cover the costs of that 109 inch parcel?

**PSA/USPS-T37-5.** In your response to UPS/USPS-T37-11 (b) - (f), you there state that parcel post rates were developed by processes which included "recovering losses associated with various factors such as Alaska transportation costs. . . ." Please explain what you mean by "recovering" these losses; and explain why Alaska transportation costs are characterized as a "loss."

**PSA/UPS-T37-6.**

(a) Please provide the estimated cost coverage TYAR for Standard (A) non-flat residual pieces in the absence of the proposed 10 cents surcharge.


(b) Please provide the cost coverage TYAR for Standard (A) flats, excluding non-flat residual shape pieces.

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

(c) USPS Witness Moeller concedes that, in this case, it is proposed that only 40% of the cost differential between letters and flats is being passed through in the form of higher flat rates (page 9). Please compare the average per piece Standard (A) flat cost being borne by Standard (A) letters because of the failure to pass through 100% of the letter/nonletter cost differential with the TYBR per piece Standard (A) residual shape cost being borne by Standard (A) flats because of the current failure to pass through the alleged flat/residual shape cost differential. Please express these costs on an average per piece basis and in gross amounts for all Standard (A) letters, all Standard (A) flats, and all Standard (A) residual shape pieces, and document the sources of your data.

## 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