

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, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS TO INTERROGATORY OF  
PARCEL SHIPPERS ASSOCIATION REDIRECTED  
FROM WITNESS KIEFER  
(PSA/USPS-T33-5)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of Parcel Shippers Association:  
PSA/USPS-T33-5, filed on October 25, 2001, and redirected from witness Kiefer.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking:



Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
November 8, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS TO INTERROGATORY OF  
PARCEL SHIPPERS ASSOCIATION  
(REDIRECTED FROM WITNESS KIEFER)**

**PSA/USPS-T33-5.** Please identify and describe all efforts that the Postal Service has undertaken since the beginning of IFY 2000 or is planning to undertake before the end of FY 2003 to reduce mail processing, transportation, or delivery costs for parcels (including efforts to reduce allied mail processing costs or to improve mail preparation) and provide a citation to where the cost savings from each initiative is included in the Postal Service's Docket No. R2001-1 rollforward.

**Response:**

For a complete listing of all initiatives, both other programs and cost reductions, please refer to USPS-LR-J-49. Exhibits A through C show other program amounts and Exhibit E, pages 1 through 3, show cost reduction amounts. For a description of these initiatives in that same library reference, please refer to Sections 1 through 4.

To see these initiatives by class, subclass and special service in the Postal Service's Docket No. R2001-1 rollforward, please refer to the following workpapers associated with my testimony (Table 6 for cost reductions and Table 7 for other programs):

WP-A Fiscal Year 2001 Before Workyear Mix Adjustment, Table A, Tables 6-7

WP-C Fiscal Year 2002 Before Workyear Mix Adjustment, Table A, Tables 6-7

WP-E Fiscal Year 2003 Before Workyear Mix Adjustment (Current Rates)  
Table A, Tables 6-7

WP-G Fiscal Year 2003 Before Workyear Mix Adjustment (Proposed Rates)  
Table A, Tables 6-7

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Richard Patel

Dated: 11/8/01

**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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Susan M. Duchek

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