

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

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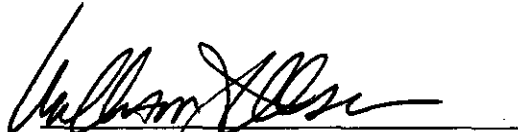
POSTAL RATE AND FEE CHANGES, 2001 )

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. R2001-1

AMAZON.COM, INC.  
FIRST INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS JENNIFER L. EGGLESTON (AMZ/USPS-T25-1-10)  
(November 8, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Amazon.com, Inc. hereby submits interrogatories and requests for production of documents. If necessary, please redirect any interrogatories and/or requests to a more appropriate Postal Service witness.

Respectfully submitted,




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Counsel for Amazon.com, Inc.

CERTIFICATE OF SERVICE

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

  
William J. Olson

November 8, 2001

**AMZ/USPS-T25-1.**

Please provide a copy of your testimony with line numbering.

**AMZ/USPS-T25-2.**

Please refer to page 29 of your testimony. The first two paragraphs on page 29 each contain a reference to "LR-I-64," but make no reference to Docket No. R2000-1. Did you mean Library Reference USPS-LR-I-64 in Docket No. R2000-1, or do you intend these references to be to Library Reference USPS-LR-J-64 in the pending docket? Please explain.

**AMZ/USPS-T25-3.**

Please confirm that the Parcel Post Unit Cost-Per-Cubic-Foot Estimates shown in your Table IV-3 at page 20 of your testimony are for transportation costs only. If you do not confirm, please indicate all other costs that are included in the unit cost figures shown in your Table IV-3 and provide a breakdown that shows transportation costs separately.

**AMZ/USPS-T25-4.**

- a. Please confirm that according to USPS-LR-J-2, "USPS Cost and Revenue Analysis, FY 2000," the density of Bound Printed Matter ("BPM") is 14.2 pounds per cubic foot. If you do not confirm, please provide the correct Cost and Revenue Analysis ("CRA") density.

- b. Does the Postal Service have any other estimate of the density of BPM? If so, please provide each such estimate, the source of such estimate, and explain any differences between the estimated densities for BPM.

**AMZ/USPS-T25-5.**

Please refer to Table VII-1, "Bound Printed Matter Unit Transportation Costs," at page 28 of your testimony, and your response to preceding interrogatory, AMZ/USPS-T25-4. On the assumption that the density of BPM is 14.2 cubic feet per pound, please confirm the following:

- a. The Non-Dropship cost to Zone 1/2, \$0.109 per pound, which you have computed, is equivalent to \$1.5478 per cubic foot. If you do not confirm, please provide the correct figure.
- b. The Non-Dropship cost to Zone 3, \$0.128 per pound, which you have computed, is equivalent to \$1.8176 per cubic foot. If you do not confirm, please provide the correct figure.
- c. The Non-Dropship cost to Zone 4, \$0.150 per pound, which you have computed, is equivalent to \$2.1300 per cubic foot. If you do not confirm, please provide the correct figure.
- d. The Non-Dropship cost to Zone 5, \$0.187 per pound, which you have computed, is equivalent to \$2.6554 per cubic foot. If you do not confirm, please provide the correct figure.

- e. The Non-Dropship cost to Zone 6, \$0.225 per pound, which you have computed, is equivalent to \$3.1950 per cubic foot. If you do not confirm, please provide the correct figure.
- f. The Non-Dropship cost to Zone 7, \$0.268 per pound, which you have computed, is equivalent to \$3.8056 per cubic foot. If you do not confirm, please provide the correct figure.
- g. The Non-Dropship cost to Zone 8, \$0.352 per pound, which you have computed, is equivalent to \$4.9984 per cubic foot. If you do not confirm, please provide the correct figure.
- h. The Destination Bulk Mail Center ("DBMC") cost to Zone 1/2, \$0.042 per pound, which you have computed, is equivalent to \$0.5964 per cubic foot. If you do not confirm, please provide the correct figure.
- i. The DBMC cost to Zone 3, \$0.080 per pound, which you have computed, is equivalent to \$1.1360 per cubic foot. If you do not confirm, please provide the correct figure.
- j. The DBMC cost to Zone 4, \$0.109 per pound, which you have computed, is equivalent to \$1.5478 per cubic foot. If you do not confirm, please provide the correct figure.
- k. The DBMC cost to Zone 5, \$0.218 per pound, which you have computed, is equivalent to \$3.0956 per cubic foot. If you do not confirm, please provide the correct figure.

- l. The Destination Sectional Center Facility (“DSCF”) cost of \$0.029 per pound, which you have computed, is equivalent to \$0.4118 per cubic foot. If you do not confirm, please provide the correct figure.
- m. The Destination Delivery Unit (“DDU”) cost of \$0.005 per pound, which you have computed, is equivalent to \$0.0710 per cubic foot. If you do not confirm, please provide the correct figure.

**AMZ/USPS-T25-6.**

Please refer to your responses to AMZ/USPS-T25-3 and 5(a), and Table IV-3, at page 20 of your testimony.

- a. Please confirm that your computed transportation cost for Inter-BMC Parcel Post to Zone 1/2, \$3.891 per cubic foot, is approximately 2.5 times your computed transportation cost for BPM to Zone 1/2, \$0.109 per pound or \$1.5478 per cubic foot (at 14.2 pounds/cubic foot). If you do not confirm, please provide the correct result.
- b. Please explain why the Postal Service’s cost of transporting a cubic foot of Parcel Post to Zone 1/2 is 2.5 times the cost of transporting a cubic foot of BPM to the same zone.

**AMZ/USPS-T25-7.**

Please refer to your responses to AMZ/USPS-T25-3 and 5(g), and Table IV-3, at page 20 of your testimony.

- a. Please confirm that your computed transportation cost for Parcel Post to Zone 8, \$11.74 per cubic foot, is about 2.3 times your computed transportation cost for BPM, \$0.352 per pound or \$4.9984 per cubic foot (at 14.2 pounds/cubic foot). If you do not confirm, please provide the correct result.
- b. Please explain why the Postal Service's cost of transporting a cubic foot of Parcel Post to Zone 8 is approximately 2.3 times the cost of transporting a cubic foot of BPM to the same zone.

**AMZ/USPS-T25-8.**

Please refer to your responses to AMZ/USPS-T25-3 and 5(i), and Table IV-3, at page 20 of your testimony.

- a. Please confirm that your computed transportation cost for DSCF-entered Parcel Post, \$0.807 per cubic foot, is approximately 2.0 times your computed transportation cost for DSCF-entered BPM, \$0.029 per pound or \$0.4118 per cubic foot (at 14.2 pounds/cubic foot). If you do not confirm, please provide the correct result.
- b. Please explain why the Postal Service's cost of transporting a cubic foot of DSCF-entered Parcel Post is 2.0 times the cost of transporting a cubic foot of DSCF-entered BPM.

**AMZ/USPS-T25-9.**

Please refer to your responses to AMZ/USPS-T25-3 and 5(m), and Table IV-3, at page 20 of your testimony.

- a. Please confirm that your computed transportation cost for DDU-entered Parcel Post, \$0.139 per cubic foot, is approximately 2.0 times your computed transportation cost for DSCF-entered BPM, \$0.005 per pound or \$0.0710 per cubic foot (at 14.2 pounds/cubic foot). If you do not confirm, please provide the correct result.
- b. Please explain why the Postal Service's cost of transporting a cubic foot of DDU-entered Parcel Post is 2.0 times the cost of transporting a cubic foot of DDU-entered BPM.

**AMZ/USPS-T25-10.**

- a. Did you compute separate unit transportation costs for Media Mail and/or Library Mail, on either a per cubic foot basis or a per pound basis, to support the rate design in witness Kiefer's testimony, USPS-T-33, Attachment E, page 3?
- b. If your answer to preceding part a is affirmative, please provide those results, or indicate where they can be found.