

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111**

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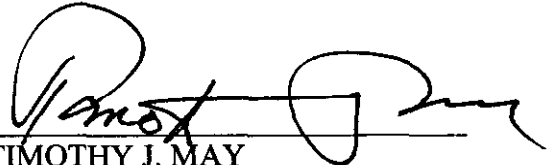
POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JAMES M. KIEFER (USPS-T33)**

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: November 9, 2001

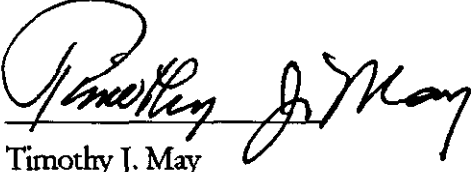
PSA/USPS-T33-6. Please refer to USPS-LR-J-106, SWP 1-1 and PPWP.xls, WP-PP-1

- (a) Please confirm that your Test Year After Rates (TYAR) revenue estimate assumes that (before migration of DBMC nonmachinable parcels to the new 3-digit nonmachinable outside (NMO) DSCF rate) approximately 6.04 percent of DBMC parcels are nonmachinable. If not confirmed, please explain your response fully.
- (b) Please describe the source of the data that you used to estimate that 6.04 percent of GYF 2000 DBMC parcels were nonmachinable and provide all underlying calculations.
- (c) For each accounting period (AP) since the Postal Service implemented the Postal Rate Commission's recommended Docket No. R2000-1 rates, please provide the total volume of Parcel Select DBMC parcels and the total volume of Parcel Select DBMC nonmachinable parcels.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served (6) copies of the foregoing document upon the United States Postal Service by hand and by First Class Mail upon all participants in this proceeding requesting such service.

Dated: November 9, 2001


Timothy J. May