

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

RECEIVED
Nov 13 5 23 PM '01

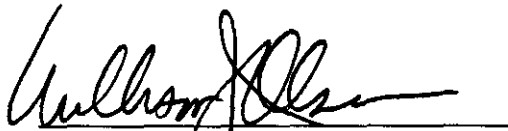
POSTAL RATE AND FEE CHANGES, 2001)

POSTAL RATE COMMISSION
Docket No. R2001-1

AMAZON.COM, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS VIRGINIA J. MAYES (AMZ/USPS-T23-1-2)
(November 13, 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,




William J. Olson
John S. Miles
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

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 13, 2001

AMZ/USPS-T23-1.

- a. Please confirm that according to USPS-LR-J-68, Appendix B, Table 9, the average Test Year transportation cost avoidance for Standard Mail dropshipped to Destination Delivery Units (“DDUs”) is \$0.1391 per pound. If you do not confirm, please provide the correct figure.
- b. Please confirm that the transportation cost avoided for Standard Mail dropshipped to a DDU should be approximately equal to the Postal Service’s total cost of shipping to DDUs Standard Mail that is entered with no dropshipment. If you do not confirm, please provide the Postal Service’s correct cost per pound for transporting to DDUs Standard Mail that is entered with no dropshipment.
- c. Please confirm that according to USPS-LR-J-2, the Cost and Revenue Analysis (“CRA”) report for FY 2000, the density of Standard Mail is 17.8 pounds per cubic foot. If you do not confirm, please provide the correct CRA density.
- d. Please confirm that the Postal Service’s average Test Year Before Rates transportation cost for shipping to DDUs a cubic foot of Standard ECR with no destination entry is approximately \$2.4760. If you do not confirm, please provide the correct cost.

AMZ/USPS-T23-2.

- a. Please confirm that according to USPS-LR-J-68, Appendix B, Table 9, the average Test Year transportation cost avoidance for Standard Mail dropshipped

to Destination Sectional Center Facilities (“DSCFs”) is \$0.1124 per pound, and the difference between mail dropshipped to DSCFs and DDUs is \$0.0267 per pound; *i.e.*, \$0.1391 – \$0.1124. If you do not confirm, please provide the correct figures.

- b. Please confirm that the difference in transportation costs avoided for Standard Mail dropshipped to DSCFs and DDUs, \$0.0267 per pound, should be approximately equal to the Postal Service’s cost of shipping Standard Mail from DSCFs to DDUs. If you do not confirm, please provide your best estimate of the Postal Service’s correct cost per pound for transporting mail from DSCFs to DDUs.
- c. Assuming that the density of Standard Mail is 17.8 pounds per cubic foot, as shown in the CRA Report for FY 2000, please confirm that the Postal Service’s average Test Year Before Rates transportation cost for shipping a cubic foot of Standard Mail from DSCFs to DDUs is approximately \$0.47526; *i.e.*, 17.8 pounds per cubic foot times \$0.0267 per cubic foot. If you do not confirm, please provide the correct cost.