

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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**POSTAL RATE AND FEES CHANGES, 2001**

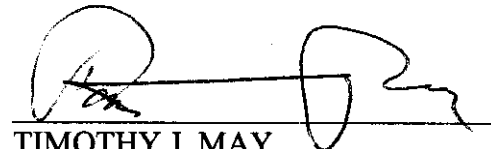
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**Docket No. R2001-1**

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO UNITED STATES POSTAL SERVICE  
WITNESS PHILIP A. HATFIELD (USPS-T18)**

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  
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Counsel for Parcel Shippers Association

Dated: November 16, 2001

**PSA/USPS-T18-1.** Please refer to Table USPS-T-18G in your testimony.

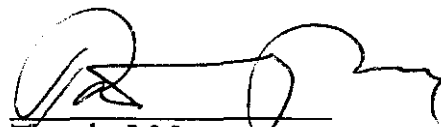
- (a) Please confirm that while the FedEx Rollforward Adjustment reduces FY 2002 costs for transporting First-Class Mail by \$91 million, it increases FY 2002 costs for transporting Priority Mail by more than \$110 million. If not confirmed, please provide the correct figures.
- (b) Please explain in detail all reasons why the FedEx Rollforward Adjustment reduces FY 2002 costs for First-Class Mail. For each reason, please quantify the dollar amount by which it changes FY 2002 costs for First-Class Mail.
- (c) Please explain in detail all reasons why the FedEx Rollforward Adjustment increases FY 2002 costs for Priority Mail. For each reason, please quantify the dollar amount by which it changes FY 2002 costs for Priority Mail.
- (d) Please confirm that the FY 2002 Fed Ex Rollforward Adjustments are rolled forward to the Test Year. If not confirmed, please explain fully.

**PSA/USPS-T18-2.** Please identify, describe, and quantify all cost reductions from the Fed Ex contract that will not be fully realized by the Test Year. Please also provide all underlying calculations.

### 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 16, 2001

  
Timothy J. May