

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER L. EGGLESTON (USPS-T25)**

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 16, 2001

PSA/USPS-T25-4. Please refer to your response to PSA/USPS-T25-1 (d) where you state, "[t]he costs in the inter-BIVIC highway account also include stops at facilities other than BMCs, and therefore may be used by both intra-BMC and DBMC mail. In fact, only 45 percent of the stop-days of Inter-BMC highway transportation are at BMCs." Please refer further to the table you provided in your response to PSA/USPS-T25-3(d) that was titled "BY 2000 Inter-BMC Stop-Days". Finally, please refer to USPS-LR-J-64, 2ptran.xls.

- (a) Please define stop-days as used in your response to PSA/USPS-T25-1 (d).
- (b) Please define Non-Bulk Mail Center (Non-BMC) Stop-Days as used in the table provided in your response to PSA/USPS-T25-3(d).
- (c) Please define BIVIC Stop-Days as used in the table provided in your response to PSA/USPS-T25-3(d).
- (d) Is mail ever transported on Inter-BMC Transportation directly from a BIVIC to a sectional center facility (SCF) that is in the service territory of a different BMC? If so, would the "stop-days" for this type of transportation leg be counted in the table titled "BY 2000 Inter-BMC Stop-Days" in the Non-BMC category.
- (e) Is Parcel Post ever transported on Inter-BMC Transportation directly from a BMC to an SCF that is in the service territory of a different BMC?
- (f) Please define Inter-BMC highway transportation as used in USPSLR-J-64.xls.
- (g) Does the Transportation Cost System (TRACS) contain any information from which one can determine whether sampled Parcel Post mail was Parcel Select mail or not? If so, please provide the TRACS field that contains the information.
- (h) Is there any way to determine from TRACS data the percentage of Non-BMC stop-days from the table provided in your response to PSA/USPS-T25-3(d) that were for trips that

began at a BMC whose service territory does not include the destination facility? If so, please explain the method fully.

PSA/USPS-T25-5. Please refer to your response to PSA/USPS-T25-1 (d) where you state, "[t]he methodological change to the Parcel Post transportation model deals with how inter-BIVIC highway transportation costs were distributed. In the Parcel Post transportation model presented in Docket No. R2000-1, it was assumed that all costs contained in the inter-BIVIC highway transportation account were costs associated with transporting mail from one BMC to another BMC. Therefore, all highway transportation costs were distributed to the long distance zone-related cost category. Between the filing of Docket No. R2000-1 and Docket No. R2001-1, I learned that this was not an accurate assumption." Please refer to USPS-LR-J-64, 2ptran.xls, worksheet Cost-dist 1.

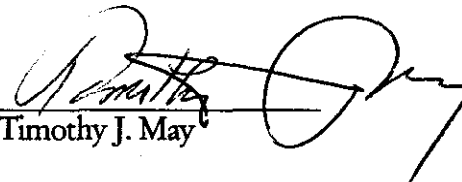
- (a) Please confirm that, in Docket No. R2001-1, you assume that intra-Bulk Mail Center (BMC) highway transportation is exclusively for transportation within the service territory of a BIVIC and therefore distribute all of the intra-BMC highway transportation costs to the intermediate cost category. If not confirmed, please explain your response fully.
- (b) Please confirm that, in Docket No. R2001-1, you assume that inter-Sectional Center Facility (SCF) highway transportation are for transportation within the service territory of a BMC and therefore distribute all of the inter-SCF highway transportation costs to the intermediate cost category. If not confirmed, please explain your response fully.
- (c) Are intra-BMC highway transportation contracts ever used to transport mail from the service territory of one BMC (including the BMC itself) to the service territory of another BIVIC (including the BIVIC itself)? Please explain your response fully.
- (d) Are inter-SCF highway transportation contracts ever used to transport mail from the service territory of one BMC (including the BMC itself) to the service territory of another BMC (including the BIVIC itself)? Please explain your response fully.

- (e) Are intra-BMC highway transportation contracts ever used to transport Parcel Post from the service territory of one BMC (including the BMC itself) to the service territory of another BMC (including the BMC itself)? Please explain your response fully.
- (f) Are inter-SCF highway transportation contracts ever used to transport Parcel Post from the service territory of one BMC (including the BMC itself) to the service territory of another BMC (including the BIVIC itself)? Please explain your response fully.
- (g) Please define Intra-BIVIC highway transportation as used in USPS-LR-J-64, 2ptran.xls.
- (h) Please define Inter-SCIF highway transportation as used in USPS-LR-J-64, 2ptran.xls.

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