

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

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POSTAL RATE COMMISSION
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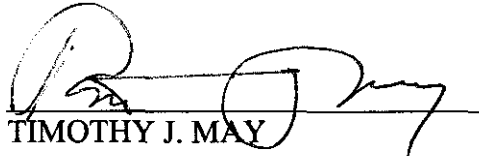
POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

**THIRD 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,



TIMOTHY J. MAY
PATTON BOGGS LLP
2550 M Street, N.W.
WASHINGTON, D.C. 20037-1350
Tel: 202/457-6050
Fax: 202/457-6315
Email: tmay@pattonboggs.com

Counsel for Parcel Shippers Association

Dated: November 27, 2001

PSA/USPS-T33-7. Please refer to your response to PSA/USPS-T33-6(c) where you refer to FY 2000 destination bulk mail center (DBMC) Parcel Post volumes.

- (a) Please confirm that these references should be to FY 2001 volumes, not FY 2000 volumes. If not confirmed, please explain your response fully.
- (b) In FY 2000, what percentage of DBMC parcels were nonmachinable outside (NMO) parcels? Please explain your data source and how you calculated this figure. If you cannot provide a specific figure, do you believe that NMOs made up a larger or smaller portion of DBMC parcels before the implementation of Docket No. R2000-1 rates than after rate implementation. Please explain your response fully.

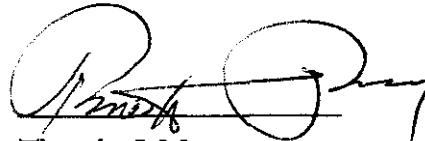
PSA/USPS-T33-8. Please refer to your response to PSA/USPS-T33-6(b) and to USPS-LR-J-64, fa_usps.xls, worksheet "Total".

- (a) Please confirm that using a 7.3% destination bulk mail center (DBMC) nonmachinable outside (NMO) figure instead of 6.04% increases the volume of mail that migrates from the DBMC NMO rate to the 3-Digit DSCF rate and therefore would increase the Parcel Post final adjustment. If not confirmed, please explain your response fully.
- (b) If your response to subpart (a) of this interrogatory is in the affirmative, by how much would using the 7.3% figure instead of the 6.04% DBMC NMO figure increase the Test Year After Rates (TYAR) Parcel Post final adjustment.

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 27, 2001



Timothy J. May