

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

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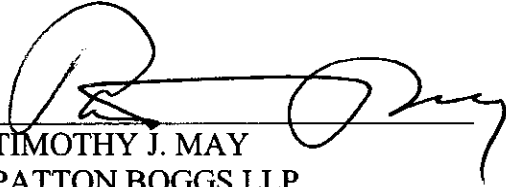
POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

**FOURTH 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 29, 2001

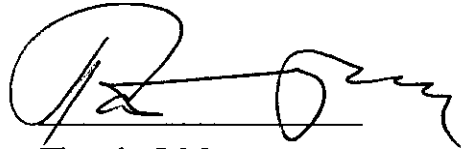
PSA/USPS-T33-9. Please refer to your response to PSA/USPS-T33-6 and USPS-LR-J-106. Also, please assume for the purpose of this interrogatory that before the implementation of the nonmachinable outside (NMO) parcel surcharge for destination bulk mail center (DBMC) parcels in January 2001, twelve percent of DBMC parcels were NMOs and that, in response to the implementation of the NMO surcharge, the NMO percentage decreased to 7.3 percent.

- (a) Please confirm that, all else being equal, a decrease in the proportion of DBMC parcels that are NMOs would reduce Parcel Post costs.
- (b) Please confirm that, all else being equal, a decrease in the proportion of DBMC parcels that are NMOs would reduce Test Year After Rates Postal Service revenues.
- (c) Is it possible that, in response to the introduction of a DBMC NMO surcharge, some mailers of DBMC NMOs began mailing these parcels using another shipper? Please explain your response fully.
- (d) Please confirm that the Postal Service did not include a final adjustment to Parcel Post costs to reflect differences in the percentage of Parcel Post DBMC parcels that were NMOs before and after the introduction of the DBMC NMO surcharge. If not confirmed, please explain fully.
- (e) Please confirm that, by using the DBMC NMO percentage from after the introduction of the DBMC NMO surcharge, your estimate of Test Year After Rates Parcel Post revenues reflect changes in the DBMC NMO percentage that occurred due to the introduction of DBMC NMO surcharge. If not confirmed, please explain fully.
- (f) Please confirm that, if the change in the DBMC NMO percentage described in the introduction to this interrogatory did indeed occur, the Postal Service's Test Year After Rates Parcel Post attributable costs would be overstated. If not confirmed, please explain fully. If so, by how much would the Postal Service's Test Year After Rate Parcel Post attributable costs be overstated?

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 29, 2001

A handwritten signature in black ink, appearing to read 'Timothy J. May', written over a horizontal line.

Timothy J. May