

BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE AND FEE CHANGES

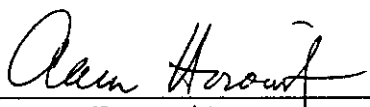
Docket No. R2001-1

**INTERROGATORIES OF THE
CONTINUITY SHIPPERS ASSOCIATION
TO USPS WITNESS KOROMA (CSA/USPS-T-37)**

Pursuant to the Commission's Rules of Practice, the Continuity Shippers Association hereby files and serves the following interrogatories directed to United States Postal Service Witness Koroma (USPS-T-37).

Dated: November 26, 2001

Respectfully Submitted,



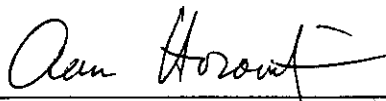
Aaron Horowitz
200 Corporate Woods Parkway
Vernon Hills, IL 60061-3167
(847) 913-3360

Attorney for the Continuity
Shippers Association

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Interrogatories to USPS Witness Koroma on all participants of record in this proceeding in accordance with sections 12 of the Rules of Practice.

November 26, 2001



Aaron Horowitz

CSA/USPS-T37-1. How many companies used BPRS in 1998, in 1999, and in 2000?

CSA/USPS-737-2. In your testimony, you provide BPRS volume numbers for 1998, 1999, and 2000.

- (a) What is the source of these volume numbers?
- (b) Are these volume numbers actuals or estimates?
- (c) If they are estimates, please provide the method for estimating them.

CSA/USPS-T37-3. In your testimony you provide revenue figures for 1998, 1999, and 2000.

- (a) Please provide the source of these figures.
- (b) Are these actuals or estimates?
- (c) If they are estimates, please provide the method for estimating them.
- d. Do these revenue estimates include annual permit fees and accounting fees?

CSA/USPS-T37-4. Please confirm that the revenue per piece given the volumes and the revenues in your testimony are \$1.75 in 1998, \$1.75 in 1999, and \$1.75 in 2000. If you cannot confirm, please provide the correct revenue per piece.

CSA/USPS-T37-5. Please explain why the revenue per piece did not decrease even though the fee per returned piece has declined from \$1.75 to \$1.62.

CSA/USPS-T37-6. In your testimony you say, "the BPRS fee is designed in this case to keep the percentage increase not too far above the systemwide average increase." Please confirm that the BPRS proposed per piece increase is 11 percent, that the systemwide average increase is 8.7 percent, and that 11 percent is 26 percent greater than 8.7 percent. If you can not confirm, please explain why.