

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

RECEIVED

DEC 5 3 08 PM '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

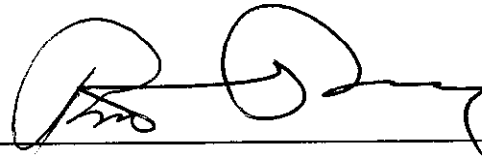
POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

FOLLOW UP INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO UNITED STATES POSTAL SERVICE
WITNESS XIE (USPS-T-2)

The Parcel Shippers Association (PSA) requests United States Postal Service Witness Xie 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: December 5, 2001

PSA/USPS-T2-1. Please refer to your response to PSA/USPS-T25-4(a)-(c) where you define stop-days. Assume that Trip A from facility A to facility B has a driving distance of x miles and Trip B from facility B to facility C has a driving distance of $10x$ miles.

- (a) On average, how much more will the highway contractor charge the Postal Service for Trip B than for Trip A? Please explain your response fully.
- (b) Please confirm that the one day of Trip A would contribute one stop-day. If not confirmed, please explain fully.
- (c) Please confirm that one day of Trip B would contribute one stop-day. If not confirmed, please explain fully.

PSA/USPS-T2-2 Please refer to your response to PSA/USPS-T25-4(a)-(c) where you define stop-days. Please refer further to witness Eggleston's response to PSA/USPS-T25-2, which states, "only 45 percent of the stop-days of Inter-BMC [bulk mail center] highway transportation are at BMCs. Therefore, the Parcel Post transportation model was adjusted by distributing 45 percent of inter-BMC highway costs (the same percent as the number of stop-days) to the long distance zone-related cost category."

Please assume that Trip C originates at facility A, which is a bulk mail center (BMC), and stops at facility B, which is another BMC, and facility C, which is a sectional center facility (SCF) within the service territory of facility B. Please further assume that intermediate transportation is primarily transportation between a BMC and the facilities within its service territory and that long-distance transportation is primarily transportation from one BMC to another BMC.

- (a) Please confirm that one day of Trip C would contribute one BMC stop-day and one non-BMC stop-day. If not confirmed, please explain fully.
- (b) What is the average driving distance between BMCs? Please describe your data source and provide your underlying calculations.

- (c) What is the average driving time between BMCs? Please describe your data source and provide your underlying calculations.
- (d) Please provide in an electronic spreadsheet format the distance from each BMC and each auxiliary service facility (ASF) to every other BMC and ASF and explain how you calculated these distances
- (e) What is the average driving distance between a BMC and the SCFs in its service territory? Please describe your data source and provide your underlying calculations.
- (f) What is the average driving time between a BMC and the SCFs in its service territory? Please describe your data source and provide your underlying calculations.
- (g) Please provide in an electronic spreadsheet format the driving distance from each BMC and each ASF to every SCF in each of their service territories and explain how you calculate these distances.
- (h) Please confirm that the average driving distance and time between two BMCs is higher than the average driving distance and time between BMCs and the SCFs in their service territory. If not confirmed, please explain fully.
- (i) Please confirm that it is accurate to distribute inter-BMC highway transportation costs to a cost category based upon the number of stop-days only if the average trip distance is approximately the same for each cost category. If not confirmed, please explain fully.
- (j) Taking into account your responses to the above subparts of this interrogatory, please confirm that distributing Inter-BMC highway transportation costs to the intermediate and long-distance cost categories based upon number of stop-days overstates the costs of intermediate transportation and understates the cost of long-distance transportation because the average distance of long-distance transportation is much longer than the average distance of intermediate transportation. If not confirmed, please explain fully.

PSA/USPS-T2-3. Please refer to your response to PSA/USPS-T25-5(c)-(f).

- (a) In FY 2000, what percentage of intra-bulk mail center (BMC) stop-days were for trips that originated and destined in the service territories of different bulk mail centers (BMCs)? Please provide your underlying calculations.
- (b) In FY 2000, what percentage of inter-sectional center facility (SCF) stop-days were for trips that originated and destined in the service territories of different bulk mail centers (BMCs)? Please provide your underlying calculations.
- (c) Please provide the average distance of intra-BMC transportation legs that originated and destined in the service territories of different BMCs.
- (d) Please provide the average distance of inter-SCF transportation legs that originated and destined in the service territories of different BMCs.
- (e) Please provide the average distance of intra-BMC transportation legs that originated and destined in the service territory of the same BMC.
- (f) Please provide the average distance of inter-SCF transportation legs that originated and destined in the service territory of the same BMC.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served six (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: December 5, 2001



TIMOTHY J. MAY