

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268B0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS KOROMA TO INTERROGATORIES OF  
THE CONTINUITY SHIPPERS ASSOCIATION  
(CSA/USPS--T37-1-6)

The United States Postal Service hereby provides the responses of witness Koroma to the following interrogatories of the Continuity Shippers Association: CSA/USPS--T37-1 to 6, filed on December 4, 2001.

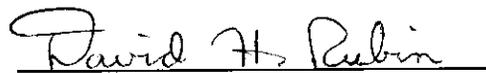
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

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December 17, 2001

**RESPONSE OF POSTAL SERVICE WITNESS KOROMA (USPS-T-37) TO  
INTERROGATORIES OF CONTINUITY SHIPPERS ASSOCIATION  
(CSA/USPS-T37-1-6)**

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

**RESPONSE:**

Four companies used BPRS in 1998, six in 1999, and fourteen in 2000.

**RESPONSE OF POSTAL SERVICE WITNESS KOROMA (USPS-T-37) TO  
INTERROGATORIES OF CONTINUITY SHIPPERS ASSOCIATION  
(CSA/USPS-T37-1-6)**

**CSA/USPS-T37-2.** 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.

**RESPONSE:**

- (a) The source of the data is the Revenue, Pieces, and Weight (RPW) Report.
- (b) Estimates.
- (c) See witness Pafford's testimony, USPS-T-3. See also, Library References USPS-LR-J-16, USPS-LR-J-17, and USPS-LR-J-21 through USPS-LR-J-23.

**RESPONSE OF POSTAL SERVICE WITNESS KOROMA (USPS-T-37) TO  
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(CSA/USPS-T37-1-6)**

**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?

**RESPONSE:**

- (a) The source of the data is the Revenue, Pieces, and Weight (RPW) Report.
- (b) Estimates.
- (c) See witness Pafford's testimony, USPS-T-3. See also, Library References USPS-LR-J-16, USPS-LR-J-17, and USPS-LR-J-21 through USPS-LR-J-23.
- (d) No.

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(CSA/USPS-T37-1-6)**

**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.

**RESPONSE:**

Confirmed.

**RESPONSE OF POSTAL SERVICE WITNESS KOROMA (USPS-T-37) TO  
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(CSA/USPS-T37-1-6)**

**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.

**RESPONSE:**

The fee of \$1.62 per returned piece was not implemented until January 7, 2001.

Prior to that, the \$1.75 fee was in place during 1998, 1999, and 2000.

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INTERROGATORIES OF CONTINUITY SHIPPERS ASSOCIATION  
(CSA/USPS-T37-1-6)**

**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.

**RESPONSE:**

Confirmed, assuming you mean "greater than 8.7 percent".

## DECLARATION

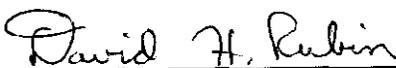
I, Samuel J. Koroma, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
SAMUEL J. KOROMA

Dated: DECEMBER 17, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
David H. Rubin

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