

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS JENNIFER L. EGGLESTON TO INTERROGATORY  
OF PARCEL SHIPPERS ASSOCIATION (PSA/USPS-T25-6)  
(December 19, 2001)

The United States Postal Service hereby files the response of witness Jennifer L. Eggleston to the following interrogatory of the Parcel Shippers Association:

PSA/USPS-T25-6, filed on December 5, 2001.

The 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

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Attorney

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December 19, 2001

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**PSA/USPS-T25-6.**

Please refer to your response to PSA/USPS-T25-1 (a) &(b) where you discuss why you distributed intra-bulk mail-center (BMC) and inter-sectional center facility (SCF) transportation costs entirely to the intermediate transportation category.

- (a) Please confirm that intermediate transportation (as used in USPS-LR-J-64) refers primarily to transportation between BMCs and SCFs within their service territories. If not confirmed, please explain fully.
- (b) Please confirm that long-distance transportation (as used in USPS-LR-J-64) refers primarily to transportation between two BMCs. If not confirmed, please explain fully.

**RESPONSE:**

(a). Not Confirmed. Intermediate transportation refers to transportation *similar* to what occurs between the BMC and an SCF in its service area. However, the Parcel Post transportation model is a simplification of the true Parcel Post transportation network. It is my understanding that sometimes transportation can occur between facilities in different service areas. Therefore, some transportation that is labeled "intermediate" could occur between facilities in different service areas.

(b) Confirmed, that the costs labeled "long distance" are assumed to incur *primarily* between two BMCs.

## 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.

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Brian M. Reimer

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