

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

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**POSTAL RATE AND FEES CHANGES, 2006**

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**Docket No. R2006-1**

**THIRD INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION  
TO  
UNITED STATES POSTAL SERVICE  
WITNESS MARC A. SMITH (PSA/USPS-T13-10-13)**

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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Dated: June 26, 2006

**PSA/USPS-T13-10.** Please refer to your response to PSA/USPS-T13-6 where you state, “A brief examination of Postnet barcodes as an indicator of automation flats rate preparation showed that Postnet 9- or 11-digit barcodes could be found on Standard Regular parcels (thicker than 1¼ inch).” Please also refer to the section of your response to the same interrogatory where you state, “It should be noted that the 35.7 percent cost share for the Standard Regular parcels with Postnet barcodes based on FY 2000 IOCS, contrasts with the apparently low share of Standard Regular parcels prepared as automation flats rates for that year.”

- (a) Please explain fully how the Postal Service determined that Postnet barcodes could be found on Standard Regular parcels thicker than 1¼ thick, including a full description of the data sources used to make this determination.
- (b) In FY 2000, did IOCS collect data on the thickness of mailpieces that were recorded as Standard Mail parcels? If so, please explain fully.
- (c) How much of the “35.7 percent cost share for the Standard Regular parcels with Postnet barcodes based on FY 2000 IOCS” was for pieces that were less than ¾ inch thick? Please provide all of your underlying calculations.
- (d) How much of the “35.7 percent cost share for the Standard Regular parcels with Postnet barcodes based on FY 2000 IOCS” was for pieces that were between ¾ inch and 1¼ inch thick? Please provide all of your underlying calculations.
- (e) How much of the “35.7 percent cost share for the Standard Regular parcels with Postnet barcodes based on FY 2000 IOCS” was for pieces that were greater than 1¼ inch thick? Please provide all of your underlying calculations.
- (f) In FY 2005, what percentage of Standard Regular parcel mail processing costs were for pieces with Postnet barcodes?

**PSA/USPS-T13-11.** Please refer to the attachment to your response to PSA/USPS-T13-3. Please provide Standard Regular RPW volume by shape and Standard Regular ODIS destinating volume by shape controlled to RPW report totals for each fiscal year from FY 1997 to FY 2005.

**PSA/USPS-T13-12.** Please refer to Attachment 13 to your testimony, which shows an unadjusted Test Year Standard Regular Parcel unit mail processing cost of 77.84 cents. Please provide unadjusted Standard Regular Parcel total mail processing costs for each fiscal year from FY 1997 to FY 2005.

**PSA/USPS-T13-13.** Please refer to Attachment 14 to your testimony, which shows Test Year mail processing unit costs by shape and subclass. Please provide mail processing unit costs for parcels/IPPs by subclass for each fiscal year from FY 2001 to FY 2005.