

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

POSTAL RATE AND FEE CHANGES, 2006)

Docket No. R2006-1

AMAZON.COM, INC.
FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOHN P. KELLEY (AMZ/USPS-T30-1)
(July 10, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Amazon.com, Inc. hereby submits interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

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AMZ/USPS-T30-1.

Please refer to Docket No. R2005-1, USPS-T-14, pages 41-43, where witness Bradley develops separate volume variabilities for large parcels and accountables.

- a. Please define the term “large parcel” as it is used in the delivery model, explain what distinguishes large parcels from other (small) parcels, and explain whether large parcels are determined by weight, cube, some other dimension(s), or some combination thereof.
- b. What is the unit delivery cost for a large parcel in BY 2005 and TY 2008? If various categories of large parcels (*e.g.*, Bound Printed Matter (“BPM”), Media Mail, Parcel Post, Parcel Select, Priority Mail) have different delivery costs, please provide the unit cost of a large parcel in each category.
- c. What is the unit delivery cost of a small parcel in BY 2005 and TY 2008? If various categories of small parcels (*e.g.*, BPM, Media Mail, Parcel Post, Parcel Select, Priority Mail) have different delivery costs, please provide the unit cost of a small parcel in each category.
- d. In BY 2005, what percent of BPM consists of large parcels, as defined by and used in witness Bradley’s econometric estimate of the parcel/accountable delivery equation?
- e. In BY 2005, what percent of Media Mail and Library Mail consists of large parcels, as defined by and used in witness Bradley’s econometric estimate of the parcel/accountable delivery equation?