

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

POSTAL RATE AND FEES CHANGES, 2006

Docket No. R2006-1

**FIRST INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO
UNITED STATES POSTAL SERVICE
WITNESS THOMAS W. HARAUSH (PSA/USPS-T4-1)**

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,

Timothy J. May
Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037
Tel: 202 457 6050
Fax: 202 457 6315
tmay@pattonboggs.com

Counsel for Parcel Shippers Association

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PSA/USPS-T4-1. Please refer to your response to POIR No.5, Question 16 which states, "There are other instances where Periodicals may show as flats on mailing statements and parcels in the data systems. For example, if a large but less than 3/4 inch flat is rolled prior to its receipt by the carrier so the carrier can handle the mailpiece more easily and efficiently, the flat would be counted as a parcel in the carrier systems because it is thicker than 3/4 inch. Furthermore, if a Periodical flat is on the top of a direct bundle given to a rural carrier, the data collector will record the bundle as a Periodical parcel, using the top-piece rule. Similarly in RCCS, rigid flats (including properly prepared "do not bend" mailpieces) that exceed five inches in height are recorded in the Parcel Compensation Category as well as other mailpieces that cannot fit in the case separation with other mail. In the CCCS, if a large Periodical flat is in the parcel hamper, a data collector will record that piece as a parcel when the carrier is using a two case system."

(a) Please discuss all instances where Standard Mail pieces that are less than 3/4 inch thick "may show as flats on mailing statements and parcels in the data systems."

(b) Does the Postal Service's method of transferring Standard Regular costs from parcels to flats account for the fact that some Standard Mail pieces that are less than 3/4 inch thick "may show as flats on mailing statements and parcels in the data systems." If so, please explain fully.

(c) Please discuss all instances where First-Class Mail pieces could be counted as flats by RPW and as parcels in the data systems.