

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 JAMES M. KIEFER TO INTERROGATORY OF AMAZON.COM  
(AMZ/USPS-T33-1)

The United States Postal Service hereby files the response of witness James M. Kiefer to the following interrogatory of Amazon.com: AMZ/USPS-T33-1, filed on November 14, 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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Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999 Fax -5402  
November 28, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER  
TO INTEROGATORY OF AMAZON.COM**

**AMZ/USPS-T33-1.**

- a. Please confirm that according to your workpaper WP-MM-7 the average Test Year Before Rates transportation cost for Media Mail is \$0.1850 per pound. If you do not confirm, please provide the correct figure.
- b. Please confirm that according to USPS-LR-J-2, the Cost and Revenue Analysis ("CRA") report for FY 2000, the density of Media Mail is 11.1 pounds per cubic foot. If you do not confirm, please provide the correct CRA density.
- c. Please confirm that the average Test Year Before Rates transportation cost for Media Mail is \$2.0535 per cubic foot. If you do not confirm, please provide the correct figure.

**RESPONSE**

- a. Confirmed.
- b. I can confirm that the CRA reports a Weight per Cubic Foot of 11.1 pounds for Media Mail.
- c. This figure cannot be confirmed as the correct figure for Media Mail transportation costs per cubic foot. It is my understanding that appropriate density data do not exist that would permit the correct transportation costs per cubic foot to be calculated for Media Mail. I have been informed that the weight per cubic foot figure reported on the CRA is based on the amount of space taken up in a shipping container, including air, and is not based on the actual dimensions of Media Mail pieces. For this reason the CRA figure is not the appropriate "density" to be used for calculating the requested cost per cubic foot.

## 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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Scott L. Reiter

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November 28, 2001