

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Parcel Return Services)

Docket No. MC2003-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER EGGLESTON
(OCA/USPS-T2-1-5)
June 6, 2003

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-23 dated June 6, 2003, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-1. The following refers to your testimony, Attachment C, page 6, footnotes 7 and 9. Please provide a copy of Docket No. R84-1, exhibit USPS-14I, as referenced in your Attachment.

OCA/USPS-T2-2. The following refers to your testimony, Attachment C, page 6, footnotes 8 and 10. Please provide a copy of the “Pieces per container in Docket No. R84-1” and all related worksheets showing the derivation of the pieces per container as referenced in your Attachment.

OCA/USPS-T2-3. The following refers to your testimony, Attachment C, page 6, footnote 4. Please confirm that the calculation of column 4 for machinable container types is: $(\text{column 3} / \text{column}[12] * \text{air factor})$ and not: $(\text{column 3} / \text{column}[13] * \text{air factor})$. If you are unable to confirm, please show the derivation of each column 4 value for machinable container types. Please cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.

OCA/USPS-T2-4. The following refers to your testimony, Attachment C, page 10.

- a. Please explain the source of the units/hour for “move containers to dock” – (28.0). If 28.0 is a calculated value, please show its derivation, cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.
- b. Please explain the source of the units/hour for “move pallets” – (14.0). If 14.0 is a calculated value, please show its derivation, cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.

OCA/USPS-T2-5. Your testimony references AOs (associate offices) and DUs (delivery units). Please explain the difference between an AO and a DU and provide examples of each.