

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 JONATHAN E. WITTNEBEL
(OCA/USPS-T4-1-8)
June 12, 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-T4-1. In your testimony at page 2, you discuss the characteristics of the Newgistics SmartLabel™ .

- a. Was the SmartLabel™ developed specifically for use with the proposed Parcel Return Services? If not, please explain the history of the label.
- b. If the label is or could be used for services other than Parcel Return Service, please explain any differences in the label when used for different services.
- c. Has the Postal Service approved this label for use with Parcel Return Service?
- d. Please provide a sample or a prototype of the Newgistics SmartLabel™ for each of the USPS services for which it is designed.
- e. Are there any postal services currently in place that use the Newgistics SmartLabel™? If so, please list them.
- f. Do any other carriers, such as United Parcel Service or Fedex, carry returned items via a Newgistics SmartLabel™? If so, please list them.
- g. Please list other channels, aside from postal services, by which consumers and small businesses can return items using the Newgistics SmartLabel™.

OCA/USPS-T4-2. In your testimony at page 2, lines 15 through 17, you list a number of methods consumers may use to enter into the mailstream a return package with a Newgistics SmartLabel™. Your list does not include placing the parcel in a collection box. Witness Gullo indicates that parcel returns may be placed in a collection box.

(USPS-T1 at 11, line 22.) Can return parcels with Newgistics SmartLabel™ be mailed at a collection box? If not, please explain.

OCA/USPS-T4-3. Your testimony includes an Exhibit A at page 5. The title of Exhibit A indicates that it estimates the characteristics of Parcel Returns [in percentages] delivered from Origin BMCs, and the source of the data is Newgistics, Inc.

- a. Please explain the phrase "Delivered From Origin BMCs."
- b. Please explain how the percentage of deliveries from origin BMCs is a satisfactory proxy to estimate the percentages of RBMC addressed returns that will be mailed from the various zones in the percentages listed, particularly since pickup will not necessarily be at every BMC.
- c. What is the basis for the Newgistics, Inc. information provided in the Exhibit?
- d. Four zone groups are set forth in the lefthand column of Exhibit A. Do these zones represent the distances returned parcels are carried from the consumers to the return BMCs or from the return BMCs to the retailers? Please explain.

OCA/USPS-T4-4. Based on your extensive experience in the parcel and logistics industries (as related at page ii of your testimony), please offer your opinion on the ten most common channels for returning merchandise ordered from vendors such as those described at page 1, lines 9 – 13. (OCA asks that you consider “channels” to refer to discrete postal services, alternative carriers such as United Parcel Service or Fedex,

and others of which you are aware). Please list these ten channels in order of the volumes carried, from largest to smallest.

OCA/USPS-T4-5. In your opinion, will the availability of the proposed PRS products be likely to stimulate new merchandise purchases? Please discuss. If so, what percentage in additional overall merchandise purchases do you believe might be stimulated? Please explain your answer.

OCA/USPS-T4-6. In your opinion, do you think that the proposed PRS products will cause a shift from other methods for returning merchandise, such as Priority Mail, intra- and inter-BMC Parcel Post, conventional Bound Printed Matter, United Parcel Service, Fedex, Airborne, and others, into PRS? Please discuss the likelihood and extent of any such shifts.

OCA/USPS-T4-7. In your opinion, if the Postal Service were to give consumers access to delivery scan information collected at postal return facilities (described in USPS-T-1, at pages 9 – 10), would that reduce the number of calls to retailers that you mention in your testimony at page 2, lines 1 – 6? Please discuss.

OCA/USPS-T4-8. Do you recommend that the Postal Service give consumers access to delivery scan information collected at postal return facilities (described in USPS-T-1, at pages 9 – 10)? Please discuss.