

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 JAMES M. KIEFER
(OCA/USPS-T3-1-13)
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-T3-1. Please refer to your testimony at page 3, lines 13 – 15. What is the rationale for having RBMC products weighed and rated by the recipient or the recipient's agent, but not RDU parcels?

OCA/USPS-T3-2. Please refer to your testimony at page 4, lines 15 –16. What is the rationale for not proposing a Return Delivery Unit product for Bound Printed Matter?

OCA/USPS-T3-3. Will Parcel Select Return Service for RBMC be available at every BMC in the U.S.? If not, please list separately the BMCs that will have PSRS RBMC available and those that will not.

OCA/USPS-T3-4. Will Parcel Select Return Service for RBMC be available at every ASF in the U.S.? If not, please list separately the ASFs that will have PSRS RBMC available and those that will not.

OCA/USPS-T3-5. Will RBMC for Bound Printed Matter be available at every BMC in the U.S.? If not, please list separately the BMCs that will have BPM RBMC available and those that will not.

OCA/USPS-T3-6. Will RBMC for Bound Printed Matter be available at every ASF in the U.S.? If not, please list separately the ASFs that will have BPM RBMC available and those that will not.

OCA/USPS-T3-7. Will Parcel Select Return Service for RDU be available at every RDU in the U.S.? If not, please list those delivery offices that will have PSRS RDU available. If applicable, explain why some offices will have the product available, while other

offices will not. If applicable, also describe any Postal Service plans to expand RDU to additional delivery offices over the course of the experiment.

OCA/USPS-T3-8. At pages 5 and 6 of your testimony, you mention that there may be some space constraints for the storage of PRS parcels. Does the Postal Service anticipate having to rent additional space or provide temporary storage structures (such as trailers or sheds) to store PRS parcels? Please discuss.

OCA/USPS-T3-9. At page 12 of your testimony, you assume that the total annual market for return parcels is 300 million pieces. Please describe the reasoning you employed to arrive at that figure. Also state any data you referred to in determining 300 million pieces to be a reasonable figure.

OCA/USPS-T3-10. At page 12 of your testimony, you assume that PSRS might capture 4% of the 300 million returned parcels. Please describe the reasoning you employed to arrive at the 4% figure. Also state any data you referred to in determining 4% to be a reasonable figure.

OCA/USPS-T3-11. At page 12 of your testimony, you assume that BPMRS might generate a volume of 7.5 million pieces. Please describe the reasoning you employed to arrive at the 7.5 million piece figure. Also state any data you referred to in determining 7.5 million pieces to be a reasonable figure.

OCA/USPS-T3-12. At page 12 of your testimony, you state that some figures used in your testimony were based on discussion with mailers.

a. How many mailers were consulted?

- b. In what types of businesses were these mailers engaged?
- c. Please estimate the range of parcel volumes these mailers ship with the Postal Service and alternative carriers, as well as the range of parcel volumes they receive as returns.

OCA/USPS-T3-13. At page 16 of your testimony, you refer to non-Postal Service forecasts concerning the size of the total returns market, and that the forecasts vary by many hundreds of millions of pieces from the lowest to the highest. Please provide these forecasts, and state the source for each forecast provided.