

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES, 2010

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Docket No. N2010-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO MEDCO WITNESS THOMAS MORIARTY  
(USPS/MEDCO-T1-16 THROUGH T1-22)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories and requests for the production of documents to Medco witness Thomas Moriarty:  
(MEDCO-T-1): USPS/MEDCO-T1-16 through T1-22.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-16.**

Please refer to your testimony at page 1, lines 19-20. There you state that “the USPS delivers about 90 percent of Medco’s mail-order medication packages . . . six days a week.”

- (a) Are the other delivery companies used to deliver “mail-order medication packages” delivering packages for Medco six days a week?
- (b) If the answer to (a) is in any way affirmative, provide the percentage of deliveries that are made on Saturday in the most recent year that data are available by (i) other delivery companies and (ii) by the Postal Service.
- (c) Please indicate whether Medco uses the Postal Service for emergency delivery of medications on Saturdays.
- (d) Describe in detail why other delivery companies are used for non-emergency delivery of mail-order medication packages on Saturdays.

### **USPS/MEDCO-T1-17.**

- (a) Please provide data indicating the percentage of total Medco prescription shipments dispensed through the mail in 2009 that were delivered on Saturdays by the Postal Service?
- (b) Please provide data indicating the percentage of Medco prescription shipments dispensed through other delivery companies in 2009 that were delivered on Saturdays.

### **USPS/MEDCO-T1-18.**

Hypothetically, assume that the Postal Service eliminated Saturday delivery to street addresses at the beginning of fiscal year 2009. Further assume that all Medco shipments of prescription medications to street addresses that (but for that hypothetical elimination) would have had an expected delivery day of Saturday in 2009, were delivered on the following Monday. Using available Medco 2009 data, calculate and reveal the percentage of total 2009 Medco shipments of prescription medications that would have had a Saturday expected delivery day (had street delivery not been hypothetically eliminated), but that would have been delivered on the following Monday instead. If the percentage is greater than 1 percent of Medco’s total fiscal year 2009 volume, please explain.

### **USPS/MEDCO-T1-19.**

Please provide data indicating the percentage of Medco mail-order medication shipments that were delivered in fiscal year 2009 to recipients whose addresses are located in areas that you would describe as:

- (a) rural;
- (b) suburban;
- (c) urban.

## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-20.**

Please refer to page 1, lines 3-4 of your reformatted testimony. There, you assert that elimination of Saturday mail delivery to street addresses would have “severe negative implications . . . on the mail-order pharmacy industry and the quality of care of patients nationwide. Provide all documents related to any quantitative and qualitative analysis conducted by or for Medco related to your assertion regarding these “severe negative implications . . . on the mail-order pharmacy industry and the quality of care of patients nationwide.”

### **USPS/MEDCO-T1-21.**

On page 1, lines 7–8 of your reformatted testimony, you state that “Medco is the largest shipper of USPS Priority Mail Open & Distribute . . . .” What percentage of prescription shipments sent by Medco enter the mail stream via the Open and Distribute service?

### **USPS/MEDCO-T1-22.**

For fiscal years 2008 and 2009, on a monthly basis, please indicate the percentage of Medco prescription fulfillment orders containing the medication intended to cover the following number of days of treatment or application:

- (a) more than 150 and up to 180 days;
- (b) more than 120 and up to 150 days;
- (c) more than 90 and up to 120 days;
- (d) more than 60 and up to 90 days;
- (e) more than 30 and up to 60 days;
- (f) more than 15 and up to 30 days;
- (g) more than 10 and up to 15 days;
- (g) 10 days;
- (h) 9 days;
- (i) 8 days;
- (j) 7 days;
- (k) 6 days;
- (l) 5 days;
- (m) 4 days;
- (n) 3 days;
- (o) 2 days;
- (p) 1 day.