

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

COMPLAINT OF THE CONTINUITY  
SHIPPERS ASSOCIATION

Docket No. C99-4

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO CONTINUITY SHIPPERS ASSOCIATION WITNESS BUC  
(USPS/CSA-T1-1-5)

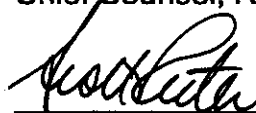
Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Continuity Shippers Association witness Buc: USPS/CSA-T1-1-5

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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January 11, 2000

INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
TO CONTINUITY SHIPPERS ASSOCIATION WITNESS BUC

USPS/CSA-T1-1. Please refer to your response to OCA/CSA-T1-8(c). Please explain why Cosmetique prefers to receive its returns via BPRS, as opposed to via the Mail Recovery Centers (MRCs), given the significant postage difference you cite in your answer.

USPS/CSA-T1-2. Please refer to your response to OCA/CSA-T1-10(a). In addition to the value of the merchandise and the cost of return postage, processing and restocking, do mailers determining whether to use BPRS also take into account the value of any payments or any information or correspondence concerning customer desires contained within the returned parcel?

USPS/CSA-T1-3. Please refer to your response to OCA/CSA-T1-10(c). Does Cosmetique have a breakdown of returned parcels which have "los[t] their integrity" between those which are not opened and those which have been opened and resealed by the recipient? Do you and Cosmetique believe a returned parcel which has been opened and resealed by the recipient is more likely to "lose its integrity" than one which has not been opened?

USPS/CSA-T1-4. Please refer to your response to OCA/CSA-T1-11(a). In light of your response to OCA/CSA-T1-10(a), would you define a "fair price" as one which is both below the value of the merchandise plus the cost of return postage, processing and restocking, and is also less than or equal to the cost of having the parcel returned by any other available means?

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USPS/CSA-T1-5. Please refer to your response to OCA/CSA-T-1-11(c), where you state: "Neither I nor members of the Continuity Shippers Association have information regarding whether 'continuity and negative option mailers, in particular, incur a relatively high parcel return rate as a normal course of business.'"

- (a) Do you mean to say that Cosmetique and other BPRS mailers do not know what percentage of their outgoing parcel volume is returned?
- (b) If the answer to part (a) is no, please provide the percentage of outgoing parcel volume returned both in total and via BPRS. This percentage need not be disaggregated by mailer. If the answer to part (a) is yes, please explain fully why this information is not available.

USPS/CSA-T1-5. Please refer to your response to OCA/CSA-T1-15, where you state that: "[w]hen a customer inquires by phone how to return a parcel (whether opened or unopened), Cosmetique informs them that they have the option of redepositing the return into the mail stream and that the parcel may be returned to Cosmetique without the customer paying the return postage. Cosmetique has informed its customers of this since before the minor modification in October 1999. See Answer to OCA/CSA-TI-14(b)."


- (a) Are you and Cosmetique aware that the recent changes to BPRS allow the Postal Service to return opened and resealed parcels *without* a BPRS label *only* if "it is impracticable or inefficient for the Postal Service to return the mailpiece to the recipient for payment of return postage."? DMCS § 935.11.

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- (b) Are you and Cosmetique aware that, despite Cosmetique's instructions to its customers, where it is practicable or efficient for the Postal Service to do so, the Postal Service may return opened parcels, even those endorsed BPRS but which have no return label, to the recipient for payment of postage?
- (c) Do you and Cosmetique believe that the lack of a return label affects the likelihood that an opened, resealed and redeposited BPRS-endorsed parcel is successfully returned by the Postal Service to the original mailer? Do you and Cosmetique believe that a BPRS parcel with a return label is more likely to be returned directly to the original mailer without either being returned to the recipient for postage, routed to an MRC, or otherwise handled in a way that delays or impedes receipt of the parcel by the original mailer, compared to a BPRS parcel without a return label?
- (d) Please explain fully why Cosmetique chooses not to use return labels.
- (e) Please explain fully why BPRS mailers who use return labels choose to do so.

## 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.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a solid horizontal line.

Scott L. Reiter

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