

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS EGGLESTON TO INTERROGATORIES OF  
UNITED PARCEL SERVICE  
(UPS/USPS-T26-1-3)

The United States Postal Service hereby provides the responses of witness Eggleston to the following interrogatories of United Parcel Service:

UPS/USPS-T26-1-3, filed on January 21, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Scott L. Reiter

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February 4, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS EGGLESTON  
TO INTERROGATORIES OF UNITED PARCEL SERVICE

**UPS/USPS-T26-1.** Provide a copy of all minutes of meetings, reports, memoranda, or other documents generated since January 1, 1999, to the present by or on behalf of the Drop Shipment Appointment System Workgroup of the Mailers' Technical Advisory Committee.

**RESPONSE:**

Please see the MTAC website at <http://ribbs.usps.gov/mtac.htm>

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**UPS/USPS-T26-2.**

- (a) Provide, separately for (i) all Standard Mail (B), and (ii) Standard Mail (B) Parcel Post, all information concerning the volume of mail that was "deposited at the wrong postal facility, forcing the Postal Service to reroute the mail to the proper facility." See 64 Fed. Reg. 71702 (December 22, 1999).
- (b) Provide a listing of all occasions since January 10, 1999, to the present when DDU rate Standard Mail (B) Parcel Post was deposited at the wrong postal facility.
- (c) Indicate the additional costs incurred by the Postal Service in rerouting to the proper facility DDU rate Standard Mail (B) Parcel Post deposited at the wrong postal facility at any time from January 10, 1999, to the present.
- (d) Provide all reports, memoranda, or other documents (not including any documents generated by mailers) relating or referring to the deposit of DDU rate mail of any Standard Mail (B) subclass or rate category deposited at the wrong postal facility at any time between January 10, 1999, and the present.
- (e) In instances where the Postal Service "reroute[d] [such] mail to the proper facility," did the Postal Service ever provide the transportation to the proper facility, or was that transportation performed by the mailer?
- (f) When the Postal Service was forced to "reroute [such] mail to the proper facility," had any of the mail been unloaded at the incorrect facility before discovering that the mail should be rerouted? If so, did Postal Service personnel conduct any of the unloading and/or the subsequent re-loading of the mail for routing to the proper facility?
- (g) State the number of times from January 10, 1999, to the present that a mailer was "directed to transport destination entry rate mailings to a facility other than the designated DDU, SCF, or BMC due to facility restrictions, building expansions, peak season mail volumes, or emergency constraints" (see 64 Fed. Reg. 71702, 71703, 7 4.6) and provide the volume of Standard Mail (B) Parcel Post involved in all such instances combined.
- (h) Provide any memoranda, reports, studies, or other documents concerning (1) the cost of scheduling appointments for the drop shipment of Standard Mail (B) mail at postal facilities, or (2) the cost of canceling, of re-scheduling, or of mailers' failures to keep scheduled appointments for the drop shipment of such mail.

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**RESPONSE:**

- (a). To the best of my knowledge the Postal Service has not collected information concerning the volume of mail that was "deposited at the wrong postal facility, forcing the Postal Service to reroute the mail to the proper facility."
- (b). To the best of my knowledge the Postal Service has not collected a list of all the times that DDU parcels have been deposited at the wrong facility.
- (c). It is my understanding that it is the mailer's responsibility to transport DDU parcels that are dropped at the wrong facility. Although the Postal Service may incur some costs, these costs have not been studied.
- (d). I am not aware of any such documents.
- (e). To the best of my knowledge, it is the mailer's responsibility to transport DDU parcels that are dropped at the wrong facility.
- (f). The requirement of DDU is that mailer's unload the parcels. It is my understanding that mailers also re-load any parcels that have been mistakenly dropped and unloaded at the wrong facility.
- (g). To the best of my knowledge the Postal Service has not collected this information.
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(h). Cost information specific to the cost of scheduling or rescheduling appointments is not available. It is my understanding that these costs are included in the MODS LDC79 cost pool, BMC platform cost pool, and non-MODS non-allied labor cost pools.

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**UPS/USPS-T26-3.**

- (a) Provide copies of all studies, reports, memoranda, quality control procedures, quality control performance results, and other documents concerning the deposit, acceptance, adherence to postal requirements, or other aspects of destination entry mailings (i) for Standard Mail (B) in general, and (ii) separately for Standard Mail (B) Parcel Post in particular.
- (b) Provide all information relating to the cost of performing quality control audits, inspections, or other procedures related to the deposit or acceptance of Standard Mail (B) generally or Standard Mail (B) Parcel Post in particular. See 65 Fed. Reg. 141 (January 3, 2000).

**RESPONSE:**

- (a). Please see the response to USPS-T10-2(b).
- (b). These costs are included cost segments 3.3 and 3.1 in Cost Segments and Components report. It is my understanding that the majority of these types of costs is in cost segment 3.3.

**DECLARATION**

I, Jennifer Eggleston, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
JENNIFER L. EGGLESTON

Dated: 2/4/00\_\_\_\_\_

## 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 cursive script, appearing to read "Scott L. Reiter", is written above a horizontal line.

Scott L. Reiter

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