



BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER L. EGGLESTON
(DFC/USPS-T26-1-4)

March 20, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Jennifer L. Eggleston.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

Respectfully submitted,

Dated: March 20, 2000

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.

DOUGLAS F. CARLSON

March 20, 2000
Emeryville, California

DFC/USPS-T26-1. At page 32 of your testimony, you explained that you used the collection costs of single-piece Standard Mail (A) as a proxy for the collection costs of BPRS mail. Please provide a complete and thorough explanation of your understanding of the collection process, including all steps in the collection process, for Standard Mail (A). In your answer, please explain all typical situations, including Standard Mail (A) deposited in collection boxes, Standard Mail (A) given to a letter carrier, and Standard Mail (A) tendered at a retail window.

DFC/USPS-T26-2. Please provide the dates and locations of each field visit you made to observe collection operations for single-piece Standard Mail (A).

DFC/USPS-T26-3.

- a. Please confirm that some post offices, while culling outgoing mail and preparing it for dispatch to the P&DC, place Standard Mail parcels that customers have requested be returned to sender — such as those from book-of-the-month clubs and music vendors — in a container separate from the container used for single-piece Standard Mail (A) or SPR's. If you do not confirm, please explain when post offices were instructed to discontinue this practice, and please provide memos and directives to that effect.
- b. Please explain why post offices described in (a) maintain this separation.
- c. At post offices described in part (a), please explain the processing steps through which the parcels go after being placed in the separate container until they are dispatched to the P&DC.
- d. Please confirm that the post offices described in (a) review each parcel and may rubber-stamp the parcel to indicate that it should be returned to sender. If you confirm, please discuss the approximate percentage of returned Standard Mail parcels that the Postal Service marks in this way.
- e. Please discuss the extent to which the procedures described in this interrogatory represent standard procedure for processing Standard Mail parcels that are being returned to sender.
- f. Please confirm that BPRS parcels may go through the procedures described in this interrogatory. If you do not confirm, please explain proper collection and culling procedures for BPRS parcels and provide memos and directives on this subject.
- g. Compared to collection costs for single-piece Standard Mail (A), please confirm that the procedures described in this interrogatory will raise collection costs of BPRS mail compared to collection costs for non-return-to-sender Standard Mail (A). If you do not confirm, please explain.
- h. Please explain how your cost estimate captures the additional collection costs of BPRS over Standard Mail (A).

DFC/USPS-T26-4. Do Standard Mail (A) collection costs include the significant volume of return-to-sender parcels from mailers such as those described in DFC/USPS-T26-3(a)? Please discuss.