

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 JOHN GULLO  
(OCA/USPS-T1-24-36)  
June 10, 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-T1-24. At page 5 of your testimony, you state that all labels addressed to an RDU would be required to contain the 9-digit ZIP Code of the post office where the parcels would be picked up. Additionally, the RDU parcel labels would have to contain a postal routing barcode assigned to the unique ZIP Code of the origin BMC.

- a. Is it thus correct that each RDU parcel would contain two ZIP Codes for the delivery of the parcel?
- b. If not, please explain.
- c. Is there any operational complication posed by having two delivery ZIP Codes for a given parcel? Please explain.

OCA/USPS-T1-25. Please refer to your testimony at page 6, lines 17 – 21. Is the origin BMC of the consumer's address the same as the RBMC? Please explain.

OCA/USPS-T1-26. Please refer to the manifesting and payment system described at page 7, lines 19 – 23, of your testimony.

- a. Do all of these activities take place at the shipper's plant, as described at pages 8 -9?
- b. Do any of the manifesting and payment activities take place at the return facility?
- c. Please explain your answers to parts a and b. Reconcile the location of the manifesting and payment activities, if necessary.

OCA/USPS-T1-27. Please refer to your testimony at page 9, lines 16 – 18.

- a. Will sampling information be collected for every returned RDU parcel?
- b. Please list individually all items of information that will be collected, preserved, and reported to the Commission during the course of the experiment.

- c. Identify those items of information that are generated by the scanning of the barcode; and separately identify those items of information that are generated by other means. Specify the other means, if any.

OCA/USPS-T1-28. Please refer to your testimony at page 10, lines 2 – 3, and page 13, lines 8 –10.

- a. What information is generated by BMC passive scanners? Please describe fully.
- b. Do BMC passive scanners function similarly to Mobile Data Collection Devices? Please explain.
- c. Are BMC passive scanners part of the Product Tracking System? Please explain.

OCA/USPS-T1-29. Please refer to USPS-T-1 at 10, lines 16 –17. List each of the individual items of information that will be captured as “scan data.”

OCA/USPS-T1-30. Please refer to USPS-T-1 at 10, lines 17 – 18. List each of the individual items of data that will be submitted by the shipper and collected in PTS.

OCA/USPS-T1-31. Please confirm that shippers who send merchandise using carriers other than the Postal Service, e.g., United Parcel Service or Fedex, will be able to offer Parcel Return Service to their customers. If so, please confirm that RDU parcel labels would not have a parcel routing barcode assigned to the unique ZIP code of the origin BMC because there would not be an origin BMC. If you cannot confirm these statements, please explain.

OCA/USPS-T1-32. Please refer to page 12, lines 5 – 6, and page 13, lines 21 – 22. Is it correct that a Postal Service employee will load PRS parcels onto the shipper's truck? If not, please explain.

OCA/USPS-T1-33. Please reconcile your statement at page 12, lines 11 – 12, "At a minimum, participating shippers or agents would be required to pick up once a week from each post office where they receive returns;" with your statement at page 13, lines 17 – 19, "Shippers would be required to pick up Parcel Return Services parcels on a regular schedule, every two days at a minimum . . . ."

- a. Which of these statements is correct?
- b. Are the pick up requirements different for RDU PRS and RBMC PRS? Please explain.

OCA/USPS-T1-34. Please explain what the expression "early bird" office means? Why is it necessary to limit RDU to early bird DDU offices?

OCA/USPS-T1-35. Please provide a sample (or prototype) RDU label.

OCA/USPS-T1-36. Please provide a sample (or prototype) RBMC label.