

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 JENNIFER EGGLESTON  
(OCA/USPS-T2-6-14)  
June 11, 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-T2-6. Please refer to your testimony at page 1, lines 6 – 8. Please explain the difference between the “Parcel Select Return Services (PSRS) product” and “the more general Parcel Return Services (PRS) product.”

OCA/USPS-T2-7. At page 4 of your testimony, you allude to two modifications that “are in response to issues raised during the litigation of Docket No. R2001-1.” Please give citations to the Docket No. R2001-1 record and Opinion that facilitate identification and resolution of the controversy.

OCA/USPS-T2-8. Please refer to your testimony at page 5, lines 7- 8, “the RBMC machinable parcels will be sorted to shipper.”

- a. Please confirm that this is a manual sortation.
- b. Please describe where in a BMC this sortation will take place.
- c. Is any special equipment needed to make this sort? If yes, please describe the equipment that will be used.

OCA/USPS-T2-9. Please refer to your testimony at page 5, lines 7 – 12, and lines 19 – 20. Please explain where in your workpapers you have accounted for the costs of moving parcels to a storage area and retrieving the parcels. If you have not accounted for these costs, why not?

OCA/USPS-T2-10. Is it correct that postal employees are responsible for loading RBMC parcels onto shippers’ trucks at BMCs (page 5, lines 7 – 12), but are not responsible for loading RDU parcels onto shippers’ trucks at area offices (page 5, lines 21 – 22)?

- a. If so, why is a distinction made between BMC operations and AO operations? Do the responsibilities of different craft positions have any bearing on such a difference? Please explain.
- b. If not, then isn't it necessary to add a cost for loading parcels at an AO? Please explain any negative answer.

OCA/USPS-T-11. Please refer to your testimony at page 5, lines 29 – 30.

- a. How was the determination made that RBMC parcels must be picked up every 2 days, while RDU parcels must be picked up every 5 days?
- b. Is lack of storage space a greater problem at BMCs than AOs? Please discuss.
- c. Is there an underlying assumption that BMCs are visited more often by a shipper than AOs? Please discuss.

OCA/USPS-T2-12. Please refer to your testimony at page 6, line 16. Is the “destination plant” that you refer to a Processing and Distribution Center or Sectional Center Facility? Please discuss.

OCA/USPS-T2-13. At page 2 lines 18 through 23, you state:

In addition, since customers want to ensure that they receive credit for the returned mail piece, it is unlikely that a large number of customers will leave a PSRS parcel for their carrier.

- a. Please explain what “credit” customers receive by taking a PSRS parcel to the USPS window service clerk as opposed to what the customer obtains by entering the PSRS parcel into the postal mail stream via a collection box or by giving the parcel to the carrier.

- b. If no credit is given to a customer who enters a PSRS parcel at a USPS window, please explain what you meant by receiving credit for the returned mail piece.

OCA/USPS-T2-14. The following questions are meant to clarify terminology usage. Frequently in your testimony, you refer to RBMC and RDU pieces entered at an AO. One example is at page 5, lines 4 through 5. You state: “[f]or purposes of the mail flow model, it is assumed that 100 percent of RBMC is entered at the origin AO.” Another example is at page 5 line 18. You state “100 percent of RDU is entered at the origin associate office (AO). When you are referring to the origin AO, are you referring to: (1) the parcel as it initially passes from the shipper through the delivery AO and is subsequently delivered to the consumer’s address, or (2) the AO where the RBMC or RDU parcel is re-entered into the mail stream by the consumer and subsequently returned to or picked up by the shipper? Please explain.