

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

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EXPERIMENTAL PARCEL RETURNS SERVICES

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Docket No. MC2003-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS JENNIFER EGGLESTON TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T2-1-5)

The United States Postal Service hereby files the response of witness Jennifer Eggleston to the following interrogatories of the Office of the Consumer Advocate:

OCA/USPS-T2-1-5, filed on June 6, 2003.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Brian M. Reimer  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -3084  
June 16, 2003

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
JENNIFER EGGLESTON TO INTEROGATORIES OF THE  
OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T2-1.** The following refers to your testimony, Attachment C, page 6, footnotes 7 and 9. Please provide a copy of Docket No. R84-1, exhibit USPS-14I, as referenced in your Attachment.

**RESPONSE:**

Footnotes 7 and 9 in Attachment C, page 6 are incorrect. Footnote 7 should read “Docket No. R2000-1, USPS-T-26, Attachment A, page 6, column 8”. Footnote 9 should read “Docket No. R2000-1, USPS-T-26, Attachment A, page 6, column 10”. The electronic version of that attachment is filed as Docket No. R2000-1, USPS LR-I-171. Errata will be filed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
JENNIFER EGGLESTON TO INTEROGATORIES OF THE  
OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T2-2.** The following refers to your testimony, Attachment C, page 6, footnotes 8 and 10. Please provide a copy of the “Pieces per container in Docket No. R84-1” and all related worksheets showing the derivation of the pieces per container as referenced in your Attachment.

**RESPONSE:**

The reference to “pieces per container in Docket R84-1” refers to the numbers cited in footnotes 7 and 9. Please see response to OCA/USPS-T2-1. Errata will be filed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
JENNIFER EGGLESTON TO INTEROGATORIES OF THE  
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**OCA/USPS-T2-3.** The following refers to your testimony, Attachment C, page 6, footnote 4. Please confirm that the calculation of column 4 for machinable container types is: (column 3 / column[12]\* air factor) and not: (column 3 / column[13] \* air factor). If you are unable to confirm, please show the derivation of each column 4 value for machinable container types. Please cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.

**RESPONSE:**

Confirmed. There is a typo in footnote 4. It should read: (column 3/ column[12]\*air factor). Errata will be filed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
JENNIFER EGGLESTON TO INTEROGATORIES OF THE  
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**OCA/USPS-T2-4.** The following refers to your testimony, Attachment C, page 10.

- a. Please explain the source of the units/hour for “move containers to dock” – (28.0). If 28.0 is a calculated value, please show its derivation, cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.
- b. Please explain the source of the units/hour for “move pallets” – (14.0). If 14.0 is a calculated value, please show its derivation, cite each source relied upon and provide copies of all source documents that have not been already filed in this docket.

**RESPONSE:**

(a) The move productivity of 28.0 is calculated as the productivity of a crossdock multiplied by 4. For lack of better data, the move operation at a DDU is assumed to be four times the speed of a crossdock operation at a Bulk Mail Center (BMC). The rationale is that delivery units/associate offices tend to be much smaller than BMCs. The crossdock productivity is shown in Attachment C, page 2. It is the average crossdock productivity (6.659) contained in Docket No. R97-1, LR-H-132, page 329 divided by the volume variability estimate (0.95) calculated in Docket No. R2001-1, USPS-T-14, Table 1.

(b) The move productivity of 14 is calculated as the crossdock productivity (7.0) multiplied by 2. For lack of better data, a move operation at both a BMC and a plant are considered to be half the distance (or twice as fast) as a crossdock operation. Please see response to (a) for documentation of the crossdock productivity.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
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**OCA/USPS-T2-5.** Your testimony references AOs (associate offices) and DUs (delivery units). Please explain the difference between an AO and a DU and provide examples of each.

**RESPONSE:**

For the purpose of my testimony, Associate Offices (AOs) and delivery units (DUs) refer to what the public normally refers to as a "Post Office." I tend to use the term interchangeably, however; I generally use the term AO when I am referring to the origin facility where the general public enters the mail and DU when I am referring to the destination facility where the carrier stations are located. For example, since the Preston King Station located at 5877 Washington Blvd, Arlington Virginia has both a retail window and carriers, it would be considered both an AO and a DU in my testimony.

## 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.

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Brian M. Reimer

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3037; Fax -3084  
June 16, 2003