

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

**EXPERIMENTAL PARCEL RETURN SERVICES**

**Docket No. MC2003-2**

**AMERICAN POSTAL WORKERS UNION, AFL-CIO  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS JAMES M. KIEFER  
(APWU/USPS-T3-1-4)  
(June 20, 2003)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU") hereby submits interrogatories and requests for production of documents to Witness James M. Kiefer.

Respectfully submitted,

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**CERTIFICATION**

I hereby certify that I have this date served the following document in accordance with the rules of practice.

\_\_\_\_\_  
Arthur M. Luby  
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APWU/USPS-T3-1. Witness Gullo states (p. 12-13) that pieces returned to a post office different from the RDU to which they are addressed will be transported to the BMC and handled as RBMC returns. What is your estimate of the number of parcels that will receive such handling? How do you account for the cost of handling these parcels?

APWU/USPS-T3-2. Please provide details about the operational and cost impacts of the Automated Package Parcel Sorter System on returned parcels. What cost adjustments did you make for the introduction of the APPSS. If you did not fully adjust your calculations for the APPSS, please explain your reasons.

APWU/USPS-T3-3. In your testimony (pp.8,9) you state that you used various weight and volume estimates from docket R2001-1. Please detail to what extent those weight and volume estimates vary from actual FY2001 and FY2002 distributions and why you determined that the estimates were more useful than actual experience.

APWU/USPS-T3-4. On page 12 of your testimony you provide volume estimates for RDU, RBMC and BPMRS packages expected in a year. Are the estimates limited to volumes generated by participants in the experiment? If so, is it possible for the Postal Service to determine the likely volume for this service when offered to all customers? How might the experiment aid in such estimates?