

**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 JENNIFER EGGLESTON
(APWU/USPS-T2-1-4)
(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 Jennifer Eggleston.

Respectfully submitted,

Arthur M. Luby
O'Donnell, Schwartz and Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Telephone: (202) 898-1707
Facsimile: (202) 682-9276
e-mail: aluby@odsalaw.com

Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

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

Arthur M. Luby
O'Donnell, Schwartz and Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126

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APWU/USPS-T2-1. Will every BMC be designated a RBMC? If not, please identify the RBMCs. Will any facilities other than BMCs be designated as RBMCs? If so, please identify those facilities. Assume that these parcel return services did not have participation limits or the time limits associated with experimental status, would you anticipate a different set of return facilities than the current set of RBMCs?

APWU/USPS-T2-2. Please refer to LR-J-64 in docket R2001-1. Please list and describe changes in parcel mail processing since completion of LR-J-64 and indicate any adjustments to your cost analysis to account for those changes. If you have not fully adjusted costs to account for these changes, please describe and quantify the impacts or potential impacts on costs

APWU/USPS-T2-3. Please list and describe changes in the transportation network affecting the transportation of parcels since the parcel transportation costs for docket R2001-1 were determined and indicate any adjustments to your cost analysis to account for those changes. If you have not fully adjusted costs to account for these changes, please describe and quantify the impacts or potential impacts on costs

APWU/USPS-T2-4. Please list and describe parcel transportation changes planned or anticipated during the term of this proposed parcel return services experiment and indicate any adjustments to your cost analysis to account for those changes. If you have not fully adjusted costs to account for these changes, please describe and quantify the impacts or potential impacts on costs.