

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-T2-6-14)

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-T2-6-14, filed on June 11, 2003.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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June 23, 2003

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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.”

**RESPONSE:**

It is my understanding that the “Parcel Return Services (PRS)” product refers to the umbrella return service that includes both Bound Printed Matter and Parcel Post returns. The “Parcel Select Return Service (PSRS)” product refers to the Parcel Post portion of PRS.

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**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.

**RESPONSE:**

What I was referring to on page 4 were two errors that I discovered either in the process of answering interrogatories for Docket No. R2001-1, or when I was reviewing the litigation of the case to plan for future improvements. A better description might be “fixing errors.” While the general plan for the PSRS case was to use the same cost models filed in Docket R2001-1, I did not want to carry over into this case previous errors that I was aware of.

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**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.

**RESPONSE:**

Redirected to witness Gullo.

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**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?

**RESPONSE:**

The implicit assumption in the cost model is that the staging area is near enough to the dock, that the “load” operation includes moving the parcel from the staging area onto the truck. In reality, the Postal Service has not had a history of “storing” parcels for mailers, so this may not be the case. As discussed in my response to OCA/USPS-T1-23 (redirected to me from witness Gullo), we will be comparing the actual process flows to the cost model assumptions during the experiment.

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**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.

**RESPONSE:**

- a. Redirected to witness Gullo.
- b. N/A. Please see witness Gullo's response to part a.

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**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.

**RESPONSE:**

Redirected to witness Gullo.

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**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.

**RESPONSE:**

For the purpose of my testimony, the terms “plant,” “processing and distribution center,” and “sectional center facility” are used interchangeably.

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**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.

**RESPONSE:**

a&b. I did not mean to imply that a customer would receive any type of credit from the shipper/mailer at the time of entry. I simply meant to hypothesize that customers would want to ensure that the returned merchandise was entered into the mailstream unharmed (*e.g.*, not stolen, not rained on) so that it would reach the mailer, who would then credit the customer for the returned merchandise.

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**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.

**RESPONSE:**

In both cases, I meant (2). For further clarification, my testimony focuses on the cost of a PSRS parcel (both RBMC and RDU). I do not consider a parcel to be a “PSRS parcel” until the consumer puts a PSRS label on the parcel and is in the process of putting the parcel back into the mailstream to be returned to the shipper.

## 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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