

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

EXPERIMENTAL PARCEL RETURNS SERVICES

Docket No. MC2003-2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GULLO
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS EGGLESTON
(OCA/USPS-T2-8, 10(a), AND 11(a) & (b))

The United States Postal Service hereby files the response of witness Gullo to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T2-8, 10(a), and 11(a) & (b), filed on June 11, 2003, and redirected from witness Eggleston.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Scott L. Reiter
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
June 23, 2003

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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:

- a. Mechanization would be used to move the parcel to a specific chute or "run-out" where a manual process would be incorporated to finalize sortation to individual shippers. However, mechanization may finalize the sort to a unique "run-out" should a shipper or agent's volume exceed manual processing efficiencies.
- b. I have been informed that the specific locations for each BMC would be identified to maximize efficiencies and reduce handlings from the primary or secondary sorting equipment to the manual distribution "tables" where the actual shipper or agent sorts are made.
- c. No special equipment would be necessary.

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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.

RESPONSE:

Yes.

- a. RBMC parcels will be containerized (into pallet boxes) and BMC personnel are required to perform loading and unloading activity when the use of a forklift is required. For parcels picked up at an RDU, the shipper or agent is responsible for loading parcels consistent with existing standards that require mailer/shipper unloading for destination delivery unit Parcel Select mailings.

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OCA/USPS-T2-11. 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. Is there an underlying assumption that BMCs are visited more often by a shipper than AOs? Please discuss.

RESPONSE:

- a. Through discussions with the functional areas responsible for operational procedures in these facilities, these minimum pick up requirements were identified to avoid disruptions to their normal operations. Further, as stated in my testimony at USPS-T-1, page 12, lines 16 – 18, for pick ups at AOs, the shipper might be required to pick up parcels more frequently based on the size of the return parcels and post office space constraints.
- b. Space is a concern at all facilities, regardless of whether it is a BMC or an AO. Because of the seasonality of the mailing and shipping industry, it is impossible to gauge the impact storage would have prior to the experiment. In response to your question on the frequency of visits to a BMC, it is my understanding that most consolidators or shippers visit BMCs for the areas they serve on a regular basis. This is primarily to enter parcels for ZIP Codes that do not generate sufficient volume to support transportation to those delivery units.

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.

Scott L. Reiter

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Washington, D.C. 20260-1137
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