

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Parcel Return Services)

Docket No. MC2003-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JENNIFER EGGLESTON
(OCA/USPS-T2-15-16)
June 25, 2003

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-23 dated June 25, 2003 are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-15. The following interrogatory refers to your testimony, Attachment C, page 6 of 15, footnote 6.

- a. Please confirm that you made the assumption that pallets, postal paks and IHCs would be 85 percent full when they were returned from the RBMC to the mailer. If you are unable to confirm, please explain.
- b. Please confirm that you made the assumption that pallet boxes would be 88 percent full, on average. If you are unable to confirm, please explain.
- c. During the RBMC and the RDU experiment, please explain what steps the Postal Service intends to take to verify the validity of the 85 percent full and 88 percent full values in an operational environment.

OCA/USPS-T2-16. The following interrogatory refers to Attachment C, pages 10 and 2 of your testimony. On page 10, for RMBC machinable mail, the units per hour for sorting parcels to a mailer is 125.4. This is based upon the productivity (units per Wkhr) for "Sack and Tie" operations shown on page 2 of Attachment C. Please explain how you determined that a unit per work hour parcel sort for a "Sack and Tie" operation is a suitable proxy for sorting RMBC machinable parcels to a mailer.