

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-T2-17-18)
June 26, 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-T2-17. The following interrogatory seeks to clarify the method of calculating the cost differences between Intra-BMC, RBMC and RDU parcels. In your testimony, you indicate that RDU and RBMC parcels will incur less mail processing and transportation costs than an Intra-BMC parcel. RBMC and RDU parcels are picked up by the retailer or its agent; thus the USPS will not incur carrier delivery costs. Please explain where in your cost analysis you account for the carrier delivery cost savings. If you did not consider carrier delivery cost savings, please explain fully why you did not do so.

OCA/USPS-T2-18. This interrogatory is related to your answer to interrogatory OCA/USPS-T1-39f redirected to you from witness Gullo and interrogatory OCA/USPS-T1-41.

- a. Where in your cost analysis do you incorporate the cost, if any, of separating an RDU parcel given to a carrier for return to the local post office to ensure that it is held at the unit for pick-up at the RDU?
- b. Where in your cost analysis do you incorporate the cost, if any, of separating an RDU parcel returned to a local post office through a window transaction to ensure that it is held at the unit for pick-up at the RDU?