

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 JENNIFER EGGLESTON TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-15-16)

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-T2-15-16, filed on June 25, 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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July 1, 2003

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
JENNIFER EGGLESTON TO INTEROGATORIES OF THE
OFFICE OF THE CONSUMER ADVOCATE

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.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. The Postal Service plans to look at the volume per shipper to see if volumes are large enough to justify “full” containers. In addition, we plan to qualitatively monitor both RBMC and RDU to see if the operations are consistent with the cost assumptions. This includes the assumptions about the fullness of containers. If it appears to be needed, we will conduct a more quantitative study.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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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.

RESPONSE:

It is my understanding that the "sack and tie" operation is where parcels are manually sorted into sacks (or other containers) at the end of a parcel sorting machine run-out at a BMC. This operation is needed for those destination separations that do not have enough volume to warrant their own run-out. Since RBMC machinable parcels will be first sent to a parcel run-out and then manually sorted to a finer level, it seemed appropriate to assume that the manual sort would be similar to the "sack and tie" operation.

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.

Brian M. Reimer

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