

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-T2-17-18)

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-T2-17-18, filed on June 26, 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-T2-17. 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.

RESPONSE:

My analysis did not account for any potential carrier delivery cost savings. In keeping with my conservative approach to estimating cost savings, it was not deemed necessary to attempt such a calculation.

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

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?

RESPONSE:

a. No additional costs were added because I did not believe there would be any additional significant costs. The carrier will simply place the parcel in one specific container. It is my understanding that there are some separations that exist today, although the number and type of separations may vary by post office.

b. No additional costs were added because I did not believe there would be any additional significant costs. The window clerk will simply have to place the parcel in one specific container. It is my understanding that there are some separations that exist today, although the number and type of separations may vary by post office.

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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