

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 JOHN GULLO
(OCA/USPS-T1-43-45)
July 1, 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 6, 2003, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-43. Your testimony indicates machinable return service parcels will be scanned during mail processing at RDUs and at BMCs. Please confirm that for purposes of gathering information on the volumes, costs, and service provided to Parcel Return Service customers, the Postal Service can, or could with minor software programming adjustments, compare the Parcel Return Service address label with the locations where the parcel was tracked to determine the following information during the experimental phase of parcel return service:

- a. The number of machinable parcels addressed to an RDU but which are delivered to the shipper/consolidator at a BMC and for which the RBMC rate is charged. If you cannot confirm, please explain.
- b. The number of machinable parcels addressed to an RBMC (or RDU) which travel inter-BMC as determined by the number of parcels scanned at two or more BMCs. If you cannot confirm, please explain.

OCA/USPS-T1-44. Your testimony indicates non-machinable return service parcels will be scanned during mail processing at RDUs or electronic manifests of such pieces will be produced by the shipper at its location for RDU pieces not captured at the RDU . Please confirm that for purposes of gathering information on the volumes, costs incurred and the service provided to Parcel Return Service customers, the Postal Service can, or could with minor software programming adjustments, compare the Parcel Return Service address label with the locations where the parcel was scanned or manifested to determine the following information during the experimental phase of parcel return service: the number of non-machinable parcels addressed to an RDU but which are delivered to the shipper/consolidator at a BMC and for which the RBMC rate

is charged. If you cannot confirm, please explain. Please also state whether or not there is a readily available method for determining the number of non-machinable parcels addressed to an RDU (or RBMC) which travel inter-BMC.

OCA/USPS-T1-45. Your testimony indicates oversized return service parcels will be scanned during mail processing at RDUs or electronic manifests of such pieces will be produced by the shipper at its location for RDU pieces not captured at the RDU .

Please confirm that for purposes of gathering information on the volumes, costs incurred and the service provided to Parcel Return Service customers, the Postal Service can, or could with minor software programming adjustments, compare the Parcel Return Service address label with the locations where the parcel was scanned or manifested to determine the following information during the experimental phase of parcel return service: the number of oversized parcels addressed to an RDU but which are delivered to the shipper/consolidator at a BMC and for which the RBMC rate is charged. If you cannot confirm, please explain. Please also state whether or not there is a readily available method for determining the number of oversized parcels addressed to an RDU (or RBMC) which travel inter-BMC.