

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 GULLO TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-43-45)

The United States Postal Service hereby files the response of witness Gullo to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T1-43-45, filed on July 1, 2003.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 2, 2003

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

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.

RESPONSE:

- a. Confirmed.
- b. Travel through more than one BMC for an individual parcel would be identifiable only if the barcode on the parcel were scanned during processing on the parcel sorting machine.

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

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.

RESPONSE:

The number of non-machinable parcels addressed to an RDU, but delivered to the shipper/consolidator at a BMC and for which the RBMC rate would be charged, could be identified through information contained in the manifest received from the shipper/consolidator. There would not be a readily available method for determining the number of non-machinable parcels addressed to an RDU (or RBMC) that travel inter-BMC.

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

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.

RESPONSE:

The number of oversized parcels addressed to an RDU, but delivered to the shipper/consolidator at a BMC and for which the RBMC rate would be charged, could be identified through information contained in the manifest received from the shipper/consolidator. There would not be a readily available method for determining the number of oversized parcels addressed to an RDU (or RBMC) that travel inter-BMC.

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.

Scott L. Reiter

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