

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-T2-19-22)
July 2, 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-T2-19. Please refer to Attachment D of your testimony, specifically to the information “# of pieces in Container (Pallet Box).”

- a. Please confirm (separately, for i. – iv. below) that, for purposes of estimating storage costs, you have assumed that all PRS pieces will be stored in a Pallet Box, i.e.:
 - i. Parcel Post
 - ii. Bound Printed Matter
 - iii. RDU
 - iv. RBMC
- b. If so, please state whether the Postal Service plans to store each of the above in Pallet Boxes.
- c. If not, state what other types of containers may be used to store parcels at RDUs versus RBMCs. Also state whether the Parcel Post/BPM feature will cause storage to differ.
- d. If other types of containers than Pallet Boxes may be used to store PRS parcels, please cite the conversion factors for such containers.
- e. Footnote 1 of Attachment D cites Attachment C, page 6, as the source of the number of pieces per Pallet Box. If PRS storage Pallet Boxes tend to be less full than the average percentage figures set forth in column 6 of Attachment C, page 6, then is it not correct that the unit cost storage estimates you present in Attachment D will be higher than estimated? If your answer is negative, please explain.

OCA/USPS-T2-20. Please refer to Attachment H, pages 1 – 4, of your testimony.

- a. Please explain whether the figures set forth for all lines and columns represent minutes or pieces, or both.
- b. Separately identify the “minutes” figures from the “pieces” figures.
- c. Explain how the data set forth on pages 1 – 4 sum separately to the figures set forth on page 5 (i.e., Volume, column 5; and Total Time, column 6).
- d. What do you mean by the “Source” footnote that reads: “[1] through [4]: Data collected directly through survey?” What data are you referring to?
- e. What do you mean by the “Source” footnote that reads: “[5]: Only includes volume when have entered data?”
- f. Also explain “Source” footnotes [6] and [7].

OCA/USPS-T2-21. Please refer to Attachment G, page 1, of your testimony. Should footnote 1 refer to page 5, rather than page 4? Please explain any negative answer.

OCA/USPS-T2-22. Please refer to Attachment G, page 2, footnote 2, of your testimony. During the experiment will it be possible for the Postal Service to calculate the average number of “returns per BMC per 5-day week,” per shipper, for all parcels routed through an RBMC based on actual return figures? Please explain any negative answer.