

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-T2-23-25)
July 3, 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-T2-23. During the experiment will it be possible for the Postal Service to calculate the average number of returns per RDU, per shipper, per week for all parcels routed through an RDU, based on actual return figures? Please explain any negative answer.

OCA/USPS-T2-24. Please refer to Attachment H of your testimony. The data provided concern activities performed by “USPS Return Technician[s].”

- a. Please describe the types of duties commonly performed by USPS Return Technicians.
- b. To what craft do USPS Return Technicians belong?
- c. Please confirm that USPS Return Technicians were the employees whose sampling activities were surveyed to produce the Attachment H data (described at page 9, lines 20 – 26, of your testimony). If you do not confirm, please explain.
- d. What classes of mail were being sampled by technicians during collection of the Attachment H survey data?
- e. Please list the 4 facilities referred to as “Location A,” “Location B,” “Location C,” and “Location D” in Attachment H.
 - i. If any of the facilities are shipper locations, then it is not necessary to give the shipper’s name or precise location. For shippers, only give the state where the sampling took place; indicate whether the shipper’s plant is located in an urban, suburban, or rural location; and describe the kind of work performed in the plant.
 - ii. For postal locations, give the plant name and precise location.

OCA/USPS-T2-25. Please describe each of the types of activities performed and reported in Attachment H:

- a. "Pieces"
- b. "Set Up"
- c. "Selecting Samples"
- d. "Weighing/Recording Samples"
- e. "Matching Worksheet to Manifest"
- f. "Validating Postage Statement to Manifest"
- g. "Transferring Postage Statement to Post Office"
- h. List the "explanation[s]" designated as "Other"
- i. "Post Office Tasks, Permit System Entry of Postage Due"
- j. In your descriptions for a. – i. above, list any equipment that the technician used to perform the activities.
- k. What is the "Worksheet" noted in part e. above? Who generates the "Worksheet"?
- l. Who generates the "Postage Statement" noted in part f. above?
- m. Does "Transferring Postage Statement to Post Office" involve travel by the technician to a facility different than Locations A - D? Please explain.
- n. Are the "Post Office Tasks" performed in Locations A – D, or facilities different from these locations? Please explain.