

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-T2-23-25)

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-T2-23-25, filed on July 2, 2003.

The Office of the Consumer Advocate has substituted a new subpart for the originally filed OCA/USPS-T2-24.e.i., and the substitution appears herein.

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 14, 2003

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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.

RESPONSE:

Our information systems are being designed to do this.

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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 locations A, B, C, and D are shipper locations, please explain why you believe that these four locations are representative of shipper locations that will be visited by postal technicians during the course of the experiment.
 - ii. For postal locations, give the plant name and precise location.

RESPONSE:

a. In general, the duties included in the survey are those used to audit a “returns manifest” when the mailer calculates postage due. The general tasks are sampling a portion of the total return volume, ensuring that the information gathered in the sample is correct on the manifest, and checking to see if the postage due is correct. This would include making adjustments to postage due as necessary.

b. The term “USPS Return Technician” is a generic term used to cover any postal employee who will perform the tasks included in the survey. Most typically, bulk mail technicians and postage due clerks would perform the tasks.

c. Confirmed.

d. Parcel Post and Priority. Only Parcel Post data was included in the cost model.

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e. While the sample is limited to four mailer sites, the sample is fairly geographically dispersed. Two of the sample sites are urban and two are suburban and they are spread out over three time zones. In addition, while the recorded times do vary by site, there is no reason to think that similar operations in other facilities would be significantly different.

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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.

RESPONSE:

- a. "Pieces" refers to those packages selected for sampling.
- b. "Set up" refers to the time spent getting ready. This includes unlocking the detached mail unit, getting the forms, zone charts and rate charts to be used, determining which door the truck is positioned at, opening the truck door, clearing a workspace, etc.
- c. "Selecting Samples" refers to the time spent selecting the parcels to be sampled. This includes determining the number of parcels to be sampled from the volumes on the prior day's manifest and the actual physical process of randomly picking out the samples from the containers coming off the truck.
- d. "Weighing/Recording Samples" includes the time spent weighing the parcels sampled, and recording those weights on the appropriate form (Manifesting Worksheet),

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along with the zone and class of mail and then returning the samples randomly to the containers. The postage is then calculated and added to each item on the worksheet.

e. "Matching Worksheet to Manifest" is the process by which the postal employee checks the manifest to see if (1) the manifest includes all sampled parcels and (2) the information on the manifest (weight/zone/class/postage) for each is correct.

f. "Validating Postage Statement to Manifest" consists of ensuring that the postage amount the mailer is paying is the same amount that appears as the total on the bottom of the manifest.

g. For mailer sites not having a USPS permit system, the postage document must be hand carried to the post office for the accounting transaction to take place.

h. The "other" category only includes travel time that was put into place due to this specific function (checking the manifest).

i. This is the actual process of entering the postage transaction into the Permit system.

j. At the time of the survey, the process was performed in a manual mode in which the clerks used hardcopy forms, pencils and calculators. Parts of this process have been automated and new data will be collected during the experiment on the impact of these improvements.

k. The "worksheet" is the piece of paper used to record the weight, class, zone and postage of the packages sampled as discussed in subpart d.

l. The mailer generates the postage documentation.

m. Yes.

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n. "Post Office Tasks" are performed at the post office that serves the mailer's facility where the sampling is performed.

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.

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