

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Premium Forwarding Service)

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN (OCA/USPS-T3-6-13)
December 8, 2004

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-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T3-6. Please refer to the electronic version of the appendix attached to your testimony at page 2, Notes 3 and 4, citing “Docket No. R2001-1, USPS-T-11, WP B3 W/3.2.1” as the source for the “Overhead Cost Factor” and the “Waiting Time Factor.” Please provide a copy of the relevant page from the referenced citation highlighting the Overhead Cost Factor of 1.0911 and the Waiting Time Factor of 1.2156.

OCA/USPS-T3-7. Please refer to the electronic version of the appendix attached to your testimony at page 2, Note 5, citing “Docket No. R2001-1, USPS-T-15, Attachment 10” as the source for the “Piggyback Factor for Window Service.”

- a. Please confirm that the window service piggyback factor for “Post Office Box” in Attachment 10 is 1.465. If you do not confirm, please explain.
- b. Please confirm that the window service piggyback factor for “Total Volume Variable” in Attachment 10 is 1.465. If you do not confirm, please explain.
- c. Please confirm that the window service piggyback factor for “C.O.D.” in Attachment 10 is 1.463. If you do not confirm, please explain.
- d. Please explain why you used the window service piggyback factor for “C.O.D.” of 1.463 as the “Piggyback Factor for Window Service” for calculating “Labor Cost: Window Acceptances of Customer Request for Premium Forwarding Service Application.”

OCA/USPS-T3-8. Please refer to the electronic version of the appendix attached to your testimony at page 2. The “Labor Cost: Clerk Collecting Fees and Postage” is \$0.0203, which is based upon the “Collection of Postage Due at Call Window was used as Proxy.” Note 6 cites “LR-J-69 Table 5.2.5.4 N8.”

- a. Please confirm that “N8” in Note 6 refers to cell N8 in Table 5.2.5.4 of LR-J-69. If you do not confirm, please explain.
- b. Please confirm that figure in cell N8 is \$0.018342. If you do not confirm, please explain.
- c. Please show all calculations used to derive the “Collection of Postage Due at Call Window was used as Proxy” of \$0.0203.
- d. Please confirm that the “Collection of Postage Due at Call Window was used as Proxy” of \$0.0203 includes an adjustment for inflation out to 2005. If you do not confirm, please explain.

OCA/USPS-T3-9. Please refer to the electronic version of the appendix attached to your testimony at page 2. The “Labor Cost: Back Office Setup” is \$1.5276, which is based upon the “PFS Back Office Setup (cost of processing Change-of-Address card used as proxy).” Note 7 cites and states “LR-J-69 Table 5.2.1.1 Row 2. Clerk is allowed two minutes”.

- a. Please confirm that the cost of \$1.5276 found in Table 5.2.1.1 Row 2 of LR-J-69 is the cost per piece of processing a change-of-address card. If you do not confirm, please explain.
- b. Please explain the meaning and purpose of the phrase “Clerk is allowed two minutes” in Note 7.
- c. Please confirm that the “PFS Back Office Setup (cost of processing Change-of-Address card used as proxy)” of \$1.5276 includes an adjustment for inflation out to 2005. If you do not confirm, please explain.

OCA/USPS-T3-10. Please refer to your testimony at page 4, lines 7-9.

- a. Please identify and describe the activities of a carrier that is “separating the mail of a customer when mail is being held or forwarded.” In particular, please discuss the handling of mail to be held or forwarded that is received from the P&DC (or other facility) in delivery point sequence in trays, and mail which must be cased.
- b. Please compare and contrast the activities identified and described in subpart a. above with the activities expected to be undertaken by the carrier with respect to the separation of PFS mail.

OCA/USPS-T3-11. Please refer to the electronic version of the appendix attached to your testimony at page 3. The “Labor Cost: Mail Separation” is \$0.19, which is based upon the “Cost of Carrier Preparation of Forwarded and Hold Mail used as Proxy” of \$0.031435 times 6 days a week. Note 1 cites “LR-J-69 Table 5.1.1.” Please confirm that the “Cost of Carrier Preparation of Forwarded and Hold Mail used as Proxy” of \$0.031435 includes an adjustment for inflation out to 2005. If you do not confirm, please explain.

OCA/USPS-T3-12. Please refer to the electronic version of the appendix attached to your testimony at page 3, Note 4, citing “Docket No. R2001-1, USPS-T-15, Attachment 10” as the source for the “Piggyback Factor for Window Service w/o PO Boxes” of 1.464. Please provide a copy of the relevant page from the referenced citation highlighting the “Piggyback Factor for Window Service w/o PO Boxes.”

OCA/USPS-T3-13. Please refer to the electronic version of the appendix attached to your testimony at page 4, where it states “Source: USPS annual average labor rates.”

- a. For the "Base Salary 02," please provide a specific citation for the Clerk Wage Rate of \$30.29.
- b. Please confirm that the Average Hourly Rate for clerks is \$29.0544. See National Payroll Hour Summary Report, Accounting Period 13-2002, Clerks/Special Delivery, Post Office, Consolidated, at page 27. If you do not confirm, please explain.
- c. Please explain why you did not use the Average Hourly Rate for clerks of \$29.0544 as the "Base Salary 02."
- d. For the "Base Salary 02," please provide a specific citation for the Carrier Wage Rate of \$31.95.
- e. Please confirm that the Average Hourly Rate for city delivery carriers is \$29.6786. See National Payroll Hour Summary Report, Accounting Period 13-2002, City Delivery Carrier, Consolidated, at page 40. If you do not confirm, please explain?
- f. Please explain why you did not use the Average Hourly Rate for city delivery carriers of \$29.6786 as the "Base Salary 02."