

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 SAMUEL J. KOROMA (OCA/USPS-T4-11-16)
December 14, 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-T4-11. Please refer to your testimony at page 4, lines 22-23, where it states, "The experimental charges are fixed, with available data used to identify an appropriate Priority Mail rate cell."

- (a) Please identify and describe the "available data" used to identify an appropriate Priority Mail rate cell for the PFS experiment.
- (b) Please provide in electronic and/or hardcopy format the "available data" referred to in your testimony quoted above.

OCA/USPS-T4-12. Please refer to your testimony at page 4, lines 22-23, where you discuss available data. For customers participating in the "Snowbird" and other similar reshipment programs operated by the Postal Service, please provide in electronic and/or hardcopy format the following information:

- (a) The number of delivery post offices providing Snowbird service and other similar reshipment programs;
- (b) The number of users of the Snowbird service and other similar reshipment programs by delivery post office;
- (c) The number of packages reshipped pursuant to the Snowbird service and other similar reshipment programs by delivery post office;
- (d) The number of packages reshipped pursuant to the Snowbird service and other similar reshipment programs from each delivery post office by weight, zone, and the amount of postage paid.

OCA/USPS-T4-13. Please refer to your testimony at page 6, "Data Collection," where it states "Additional data elements would be available from respective offices' Master and

Tracking Logs.” Please identify the “[a]dditional data elements” referenced in your testimony quoted above that would be relevant for the Data Collection Plan.

OCA/USPS-T4-14. Please refer to Attachment A of your testimony, the MC2005-1 Data Collection Plan. Please confirm that the Data Collection Plan will collect the data listed in subparts a - g, below. If you do not confirm, please explain. (Note: The data listed below is not intended to require the production of data that would identify specific customers or offices.)

- (a) Number of offices providing PFS;
- (b) Number of PFS customers at each office;
- (c) Duration of service in weeks for each PFS customer;
- (d) Number of PFS Priority Mail reshipments at each office;
- (e) The amount of revenue obtained from PFS at each office;
- (f) The weight of each PFS Priority Mail reshipment; and,
- (g) The destinating zone of each PFS Priority Mail reshipment.

OCA/USPS-T4-15. Please refer to Attachment A of your testimony, the MC2005-1 Data Collection Plan. Please confirm that the Data Collection Plan will collect data listed in subparts a - e, below, concerning the quality of PFS. If you do not confirm, please explain. (Note: The data listed below is not intended to require the production of data that would identify specific customers or offices.)

- (a) Number of PFS customer complaints for each office;
- (b) The nature of PFS customer complaints at each office;
- (c) The number of PFS Priority Mail reshipments occurring on days other than Wednesday (for reasons other than a Federal holiday);

- (d) The number of days elapsing from the day of entry to the day of delivery for each PFS Priority Mail reshipment for each office; and,
- (e) The number of PFS Priority Mail reshipments that did not occur during a week, although purchased by a PFS customer, for each PFS customer at each office, and the reason therefore. For example: At office 1, customer A purchases PFS for a ten week period. On week 8, no PFS Priority Mail reshipment is made to the customer's temporary address.

OCA/USPS-T4-16. Please refer to Attachment A of your testimony, the MC2005-1 Data Collection Plan. Please confirm that as part of the Data Collection Plan, the Postal Service intends to survey PFS customers to obtain their comments concerning the quality of PFS. If you do not confirm, please explain.