

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-T3-14-18)
January 10, 2005

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-T3-14. Please refer to your testimony, revised December 20, 2004, at pages 3-5, referring to the section entitled "B. Per-Shipment Costs."

- (a) Please confirm that for PFS customers, Priority Mail pieces not requiring a scan or otherwise accountable arriving after dispatch on Tuesdays and prior to dispatch of the weekly PFS Priority Mail reshipment piece on Wednesdays would be held for inclusion in the weekly PFS reshipment piece. See response of witness Cobb to OCA/USPS-T1-4. If you do not confirm, please explain.
- (b) Please confirm that the Priority Mail pieces referred to in subpart (a) constitute, on average, one-sixth (i.e., one day per week, Wednesday, divided by six delivery days per week) of Priority Mail pieces received by PFS customers. If you do not confirm, please explain.
- (c) Please confirm that the Priority Mail pieces referred to in subpart (a) would increase the average weight of the weekly PFS Priority Mail reshipment piece. If you do not confirm, please explain.
- (d) Please confirm that your cost model for PFS per-shipment costs does not include any costs associated with Priority Mail pieces referred to in subpart (a) included in the weekly PFS reshipment piece. If you do not confirm, please explain.
- (e) Please estimate the costs associated with Priority Mail pieces referred to in subpart (a) included in the weekly PFS reshipment piece.

OCA/USPS-T3-15. Please refer to your testimony, revised December 20, 2004, at pages 3-5, referring to the section entitled "B. Per-Shipment Costs."

- (a) Please confirm that Package Service packages, parcels and irregular pieces not included in the weekly PFS Priority Mail reshipment piece will incur costs associated with labeling, weighing and rating in order for such Package Service pieces to be reshipped as Priority Mail, postage due. If you do not confirm, please explain.
- (b) Please confirm that your cost model for PFS per-shipment costs does not include any costs associated with preparing for reshipment as Priority Mail, postage due, those Package Service packages, parcels and irregular pieces not included in the weekly PFS Priority Mail reshipment piece. If you do not confirm, please explain.
- (c) Please estimate the cost of preparing for reshipment as Priority Mail postage due those Package Service packages, parcels and irregular pieces not included in the weekly PFS Priority Mail reshipment piece.

OCA/USPS-T3-16. Please refer to the electronic version of the appendix attached to your testimony, revised December 20, 2004, at page 2. The “Labor Cost: Clerk Collecting Fees and Postage” is \$0.020, which is inflated from the cost figure \$0.018342 taken from “LR-J-69 Table 5.2.5.4 Cell N8.”

- (a) Please confirm that the cost figure \$0.018342 is based upon an estimate of 0.0005 Hours/Piece for “Collection of Postage Due” for UAA Mail Forwarded with Postage Due and Delivered at Call Window. If you do not confirm, please explain.
- (b) Please confirm that 0.0005 Hours/Piece represents 1.8 seconds per piece (3,600 seconds * 0.0005) for “Collection of Postage Due” for UAA Mail

Forwarded with Postage Due and Delivered at Call Window. If you do not confirm, please explain.

- (c) Please explain the rationale for using the cost of \$0.020 (inflated from the cost figure \$0.018342) from "Collection of Postage Due" for UAA Mail Forwarded with Postage Due and Delivered at Call Window, based upon 1.8 seconds, as a proxy for "Clerk Collecting Fees and Postage" from a PFS customer.

OCA/USPS-T3-17. Please refer to the electronic version of the appendix attached to your testimony, revised December 20, 2004, at page 3, and the "Piggyback Factor for All Other Special Services" of 1.356. Also, please refer to OCA/USPS-T3-12 and your response thereto. Please explain the rationale for using the Piggyback Factor for city delivery carriers for Total Special Services, rather than the Piggyback Factor of 1.465 for window service for Post Office Box.

OCA/USPS-T3-18. Please refer to the electronic version of the appendix attached to your testimony, revised December 20, 2004, at page 3, Note 2, which cites "Special Studies Field Observation." Also, please refer to your testimony at page 4, lines 16-18, where it states "During field observations of the current, informal reshipment services, that were conducted at small, medium, and large delivery units, I found that the time required to perform these tasks is about two minutes."

- (a) On line 18, what tasks are being referred to in the phrase "these tasks?" What type of postal employee performed each of "these tasks?" Please explain.

- (b) How many field observations were conducted of the “tasks” referred to in subpart (a), above? How many observations were made of the “tasks” referred to in subpart (a), above, at each of the small, medium, and large delivery units? How long did you observe the “tasks” referred to in subpart (a), above, at each of the small, medium, and large delivery units?
- (c) What classes of mail were associated with the “tasks” referred to in subpart (a), above? Specifically, were there letter-shaped and flat-shaped pieces, as well as packages, parcels, and irregular pieces associated with the “tasks” referred to in subpart (a), above? If so, from what classes of mail? How were the letter-shaped and flat-shaped pieces, packages, parcels, and irregular pieces handled? Were any of the packages, parcels, and irregular pieces handled separately from letter-shaped and flat-shaped pieces? Please explain.
- (d) Please describe your observations of the “tasks” referred to in subpart (a), above. Did you observe any problems, delays or difficulties in carrying out the “tasks” referred to in subpart (a), above? Please explain.
- (e) Please provide all notes, memoranda, summaries or other documents prepared by you or other postal personnel as a result of your field observations.