

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL PREMIUM
FORWARDING SERVICE

Docket No. MC2005-1

RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS SAMUEL J. KOROMA
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T4-17, 18, AND 22)
(January 26, 2005)

The United States Postal Service hereby provides the responses of witness Koroma to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-17, 18, and 22, filed on January 12, 2005. Interrogatories OCA/USPS-T4-19 to 21 have been redirected to the Postal Service.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

/s/
David H. Rubin

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
KOROMA TO INTERROGATORY FROM THE
OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T4-17. Please refer to your testimony at page 4, lines 22-23, which cites “available data.” Also, please refer to the response of witness Cobb to DBP/USPS-T1-5(b)-(c), where it states, “Payment for these informal [reshipping] arrangements entailed . . . deposit by a customer of funds in a postal administered account . . . [which] permitted weighing and rating of each package.” Please confirm that the “available data” referred to in your testimony consists, in part, of information from postal administered accounts under these informal reshipping arrangements concerning the “weighing and rating” of packages. If you do not confirm, please explain. If you do confirm, please provide all data related to the weighing and rating of packages reshipped under these informal arrangements.

RESPONSE:

Not confirmed. "Available data" refers to the Household Diary Study information.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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OCA/USPS-T4-18. Please refer to your testimony at page 6, referring to “Data Collection,” and Attachment A, the “MC2005-1 Data Collection Plan.” Please explain how the Data Collection Plan will obtain data to verify the assumptions, proxies and time estimates underlying the cost model for PFS developed in the Appendix accompanying the testimony of witness Abdirahman (USPS-T-3).

RESPONSE:

The Data Collection Plan in Attachment A is primarily concerned with the characteristics of the shipments. However, the test will also afford the opportunity to conduct studies to support any permanent filing. No specific studies have been defined; however, as noted in the plan, a qualitative evaluation of planned operations will be enabled which could inform the structure and requirements of the studies, including cost studies, that would be required to support a permanent service.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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OCA/USPS-T4-22. Please refer to Attachment C of your testimony, revised January 7, 2005.

- (a) Attachment C at page 1 shows Package Services “Pieces per HH per Week” of 0.3, citing the Household Diary Study Table 2.5. Please confirm that 0.3 Package Services “Pieces per HH per Week” represents 3.3 (17 Annual Package Services Pieces per Household / 52 weeks * 10 weeks of PFS resh Shipments per customer) Package Services pieces for the average PFS customer. If you do not confirm, please explain.
- (b) Attachment C at page 2 states that “I expect that PFS customers will tend to receive fewer . . . Package Services parcels at their primary addresses than the Household Diary Study indicates,” i.e., less than 0.3 Package Services “Pieces per HH per Week.” How many Package Services “Pieces per HH per Week” do you estimate PFS customers will receive? Please show all calculations and explain all assumptions.

RESPONSE:

(a) Not confirmed. As I state in Attachment C, page 2, of my testimony, PFS customers at a temporary address might postpone orders until they return to their primary addresses, and thus receive fewer Package Services pieces than reflected in the Household Diary Study.

b) I have no basis for quantifying an estimate of packages per week received at the primary address.

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.

/s/

David H. Rubin

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January 26, 2005