

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

Parcel Return Service )

Docket No. MC2006-1

OFFICE OF CONSUMER ADVOCATE  
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE  
(OCA/USPS-1-6)  
October 31, 2005

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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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 901 New York Ave. NW, Suite 200, Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-1). Specifically, "the party shall make the claim expressly and shall describe the

nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term “workpapers” shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should “show what the numbers were, what numbers were added to other numbers to achieve a final result.” The witness should “prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results.” Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-1. Please review the Docket No. MC2003-2 Stipulation and Agreement, Attachment C, Section C. Please provide the “second report” for FY 2005, sections A and B. If you are unable to provide the “second report,” please explain why.

OCA/USPS-2. In Docket No. MC2003-2, witness Kiefer, on page 15 of his testimony, stated that in the developmental stages of the Parcel Return Service (PRS) products, the Postal Service had “numerous” discussions with mailers.

- a. Has the Postal Service had any additional discussions with the current users of the Parcel Return Service regarding future volume projections? If so, please provide a detailed summary of any discussions related to future volume estimates. If not, please explain how the Postal Service arrived at the need for PRS beyond FY 2006.
- b. Has the Postal Service had any additional discussions with the current users of the Parcel Return Service regarding operational problems – other than the return label problem – relating to PRS? If so, please provide a detailed summary of those discussions, actions taken to resolve problems and the final resolution. If no problems were identified, please so state.
- c. Has the Postal Service had any PRS “staging” issues and if so, how are those issues being handled? (Docket No. MC2003-2, USPS-T-1 at 12.)
- d. Has either the Postal Service or the current users of the PRS had service related issues regarding timely pick-up of the PRS packages at the RBMC or the RDU? If so, please provide a detailed summary of those

discussions and the final resolution. If no problems were identified, please so state.

- e. Has any participant taking part in the PRS experiment complained or taken issue with the quality of service received from the USPS? If so, please provide a detailed summary of those discussions listing all service related issues and the final resolution. If no problems were identified, please so state.

OCA/USPS-3. Please include in your response to this interrogatory cites to all source documents used, provide copies of all source documents not previously filed in this docket, and show the derivation of all calculated values. The current PRS experiment has elicited only two third-party participants. Given the experience the Postal Service has garnered during the experiment, please respond to the following:

- a. The average actual square footage used to store PRS parcels per merchant or third-party vendor per week for RBMCs and RDUs. Please include in your response cites to all source documents, provide copies of those documents not previously filed in this docket and show the derivation of all calculations.
- b. Where in each RBMC and RDU does the Postal Service expect to store increased PRS returned parcel volumes if more merchants or third-party vendors participate? Please fully explain your response.
- c. At what volume level of PRS return parcels destined to RBMCs will the Postal Service need to either adjust operations and/or expand facilities to

accommodate the PRS parcel storage? Please fully explain your response

- d. At what volume level of PRS return parcels destined to RDUs will the Postal Service need to either adjust operations and/or expand facilities to accommodate the PRS parcel storage? Please fully explain your response.

OCA/USPS-4. In Docket MC2003-2, the Postal Service restricted access to the Return Delivery Unit (RDU) to participants electing the “early bird” option. (Docket No. MC2003-2, USPS-T-1 at 16.) Does the Postal Service anticipate continuing this restriction if the PRS is offered on a permanent basis? Please fully explain your response.

OCA/USPS-5. In Docket No. MC2003-2, USPS witness Keifer (USPS-T-3 at 4) indicated that the Postal Service did not have volumes for Parcel Return Service (PRS). The experimental PRS was expected to provide information to improve the data available for PRS rate design. For each year, FY 2004 and FY 2005, please provide total PRS volumes by weight category and by zone. Provide cites to all source documents and provide copies of those documents not filed in this docket.

OCA/USPS-6. In Docket No. MC2003-2, USPS witness Keifer (USPS-T-3 at 17) indicated that the proposed changes “will offer merchants and their agents a faster way to take possession of their customers’ returns....” Currently, what evidence does the

USPS have that indicates the success of this service? Please include in your response specific data comparing the speed with which agents take possession of their customers' returns using PRS and the alternative service. Cite all source documents relied upon to respond to this query, show the derivation of all calculated values and provide copies of those documents not previously filed in this docket.