

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

Parcel Return Service)

Docket No. MC2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SHARON DANIEL (OCA/USPS-T1-1-6)
October 31, 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 interrogatory OCA/USPS-1-6, dated October 31, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-1. On page 2 of your testimony, you state, “Based on my understanding of the market, I expect significant growth to continue in FY 2006.”

Please fully explain what your understanding of the “market” is. In your response to this interrogatory, include cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.

OCA/USPS-T1-2. The following refers to your testimony at page 3, footnote 1. Please confirm that your reference to Docket No. MC2003-1 should be MC2003-2. If you are unable to confirm, please explain fully.

OCA/USPS-T1-3. On page 4 of your testimony, you indicate that the USPS “assign[ed] each participant a unique Zip Code beginning with the prefix 569.”

- a. For each of the two third-party participants currently using Parcel Return Service (PRS), is one and only one suffix assigned to a given third-party? For example, Third-party A is assigned a ZIP Code 56901; Third-Party B is assigned Zip Code 56902.
- b. If you are unable to confirm part a of this interrogatory, please provide specific details on the use and assignment of the 569 prefix.

OCA/USPS-T1-4. Please refer to page 5 of your testimony. You state, “This shortcoming of the original label was remedied by removing the city and state and replacing it with a generic address block that simply states the agent’s or merchant’s

name” At page 3 of your testimony, you indicate that there are only two third-party agents currently participating in the experiment.

- a. Currently, are all PRS packages being sent back to the third-party agent who originally placed the parcel into the USPS mail stream?
- b. If you are unable to confirm part a of this interrogatory, please specifically identify who is the recipient of a returned USPS PRS package and under what circumstances that recipient is (1) the merchant or (2) the third-party agent.

OCA/USPS-T1-5. Please refer to page 7 of your testimony, lines 8 through 13.

- a. Please specifically identify how you arrive at your estimate of 12.8 million PRS pieces. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.
- b. Please specifically identify how you arrived at your estimate of 3.2 million RDU pieces. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.

OCA/USPS-T1-6. The experimental Parcel Return Service allowed packages to be entered into the mail stream by “giv[ing] it to their carrier, plac[ing] it in a collection box, schedul[ing] a pickup or bringing it into any post office.” (Docket No. MC2003-2, USPS-T1 at 11.)

- a. For FY 2005, please provide the total volume of PRS parcels entered into the mail stream via: (1) a carrier, (2) a collection box, (3) a pickup, and (4) a post office.
- b. Please provide the forecasted FY 2006 volumes of PRS parcels entered into the mailstream via (1) a carrier, (2) a collection box, (3) a pickup, and (4) a post office. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.