

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

Parcel Return Service

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Docket No. MC2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL W. MILLER (OCA/USPS-T2-1-11)
November 3, 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-1-6, dated October 31, 2005 are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-1. Please refer to attachment G of your testimony, the table titled “Postage Due Sampling Ratio, USPS Sample Size by Volume Range[1].”

- a. Please confirm that, for the range 1 – 19, all 19 pieces were counted. If you are unable to confirm, please specifically identify the number of pieces counted and the derivation of all calculated values.
- b. Please confirm that for the range 20 – 99, 16 pieces (20 percent rounded) were counted. If you are unable to confirm, please specifically identify the number of pieces counted and the derivation of all calculated values.
- c. Please confirm that for the range 100 – 199, 15 pieces (15 percent) were counted. If you are unable to confirm, please specifically identify the number of pieces counted and show the derivation of all calculated values.
- d. Please confirm that for the range 200 – 299, 10 pieces (10 percent) were counted. If you are unable to confirm, please specifically identify the number of pieces counted and the derivation of all calculated values.

OCA/USPS-T2-2. The following interrogatory refers to Attachment C, page 2, footnote 1, of your testimony and Attachment C, page 2, footnote 1 of USPS witness Eggleston’s, Docket No. MC2003-2 testimony. The source you both reference for your “productivities (units per Wkhr)” is Docket No. R97-1, LR-H-132, page 329. However, none of the productivities you use in your Attachment C, page 2 match those used by witness Eggleston. Please fully explain why the unloading productivities and the dump containers and sack shake out productivities are not the same as used by witness Eggleston though you both reference the same source. Include in your response the

derivation of all calculated values, cite all sources relied upon and provide copies of those sources not previously filed in this docket.

OCA/USPS-T2-3. In your testimony in Docket No. R2005-1 (USPS-T-20 at 3), you note that that Singulation Scan Induction Units (SSIU) have been added to the Secondary Parcel Sorting Machine (SPSM) and that updated Government Fiscal Year (GFY) 2003 Productivity Information Management System (PIMS) productivities were used in the models.

- a. Please provide a copy of the GFY 2003 PIM if one has not been previously filed or provide a reference to the Commission's files if it has been filed.
- b. Please fully explain how the impact of the SSIU has affected the Secondary Parcel Sort. Cite all source documents referenced, provide copies of all source documents not previously filed in this docket, and the derivation of all calculated values.

OCA/USPS-T2-4. The following refers to your testimony, in this docket, at pages 2 and 3. You state, "Window service adjustments have then been made using Docket No. R2005-1 Base Year 2004 data." Please fully explain the window service adjustments that were made. Include in your response, each adjustment made, the rationale for that change, the derivation of all calculated values, cite all sources and provide copies of all source documents not previously filed in this docket.

OCA/USPS-T2-5. The following refers to your testimony Attachment C, page 2 and USPS witness Eggleston's testimony, Attachment C, page 2, in Docket No. MC2003-2. The variabilities used in witness Eggleston's testimony differ from the variabilites you use in your testimony for: (1) BMC Platform, (2) BMC Other, (3) PSM, (4) SSM, (5) NMO Distribution at BMCs, (6) Platform Non-BMC, (7) NMO Distribution at Non-BMCs, and (8) LDC43.

- a. If the variabilities used in your testimony Attachment C, page 2, as listed above, differ from the variabilites utilized in the recent Commission opinion in Docket No. R2005-1, please resubmit all pages of your Attachment C using the same variability values as used by the Commission for the rates recommended in that opinion and include in your response a variability for SPBS that is comparable to the SSB variability used by the Commission in the opinion.
- b. If in response to part a, above, you resubmit page 2 of Attachment C using different variabilities, please update all related Tables, Attachments and workpapers impacted by the change in your testimony in this docket.

OCA/USPS-T2-6. The following refers to your testimony, Attachment C, page 4. You cite footnote "21/" for probabilities that PRS mail is processed on either a PPSM or a SPSM; however, you have omitted the note. Please provide a cite to the source of the probabilities, provide a copy of the source document if one has not been previously filed in this docket, and the derivation of all calculated values.

OCA/USPS-T2-7. The following refers to your testimony, Attachment C, page 5.

“Rows (1&2)” of Attachment C, page 5, references Docket No. R2001-1, LR-J-64,

Attachment A, page 6. Docket No. R2001-1, LR-J-64, Attachment A, page 6 indicates

that the value for “inter-BMC that is retail” is 36.7 and is a proxy for the percent of Parcel Post entered at an AO.

- a. Please explain why you use 25.6 percent for inter-BMC that is retail instead of the 36.7 used by USPS witness Eggleston in Attachment C, page 5, of her testimony in Docket No. MC2003-2.
- b. If the value you use (25.6 percent) is a calculated value, please provide the derivation, cite all sources relied upon and provide copies of those source documents not been previously filed in this docket.

OCA/USPS-T2-8. The following refers to your testimony, Attachment C, page 5.

“Rows (1&2)” of Attachment C, page 5, references Docket No. R2001-1, LR-J-64,

Attachment A, page 6. Docket No. R2001-1, LR-J-64, Attachment A, page 6 indicates

that the value for “intra-BMC that is retail” is 32.2 percent and is a proxy for the percent of Parcel Post entered at an AO.

- a. Please explain why you use 38.5 percent for intra-BMC that is retail instead of the 32.2 used by USPS witness Eggleston in Attachment C, page 5, of her testimony in Docket No. MC2003-2.
- b. If the value you use (38.5 percent) is a calculated value, please provide the derivation, cite all sources relied upon and provide copies of those source documents if they have not been previously filed in this docket.

OCA/USPS-T2-9. The following refers to your testimony at page 4.

- a. Please provide a copy of the BMC survey and the survey results “conducted in order to determine the methods in which the 21 facilities” currently isolate PRS machinable mail pieces.
- b. You indicate that you used an estimate of 97.36 percent for PRS machinable mail processed through the PPSM. Please provide the derivation of the estimate, cite all source documents referenced and provide copies of those documents not previously filed in this docket.
- c. You indicate that you used an estimate of 24.82 percent for PRS machinable mail that is further processed on the SPSM. Please provide the derivation of the estimate, cite all source documents referenced and provide copies of those documents not previously filed in this docket.

OCA/USPS-T2-10. The following refers to your testimony at page 5 concerning storage cost estimates.

- a. Please identify the number of days per week that the two third-party vendors currently pick-up PRS parcels. Include in your response the specific day(s) of the week that PRS pick-ups are occurring.
- b. Do the existing third-party vendors currently pick-up PRS parcels on Saturdays?

- c. Please provide the “PRS BMC-specific volume data” used to calculate the 1.834 storage days. Please show the derivation of the storage days. Include in your response cites to all source documents and provide copies of all source documents not previously filed in this docket.

OCA/USPS-T2-11. Please refer to storage cost estimates in your testimony at page 5.

- a. For calculating the daily cost of storage space, please explain why you chose to use 303 delivery days rather than the 250 days per year formerly used by witness Eggleston.
- b. What “other postal analyses” use 303 days per year?