

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 SHARON DANIEL (OCA/USPS-T1-7-9)
November 8, 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-T1-7. On page 7 of your testimony, you forecast 12.8 million Parcel Select Parcel Returns for FY 2006. One-quarter, or 3.2 million pieces, are forecast to be RDU returns. In light of the Postal Rate Commission's recent R2005-1, Opinion and Recommended Decision, please specifically identify what, if any, changes should be made to your volume forecast. If the Commission's recent Decision has no impact upon your volume forecast, please so state and provide an explanation.

OCA/USPS-T1-8. You indicate in your testimony on page 8, footnote 9, that insurance is not offered for return service because the Postal Service does not have custody of the returned mail for the entire trip back to the merchant.

- a. You state that some customers "may also seek insurance." Have there been any requests or inquiries for insurance from the current participants or merchants using the service? Please discuss.
- b. Have consumers requested that insurance be added to the available special services?
- c. If damage occurs to returned parcels while in the custody of the Postal Service, which party is responsible or must absorb the loss—the consumer, the participants, the merchant, or the Postal Service? Please explain.

OCA/USPS-T1-9. In the Postal Rate Commission's Docket No. R2005-1 Opinion and Recommended Decision, Appendix G, page 17, shows PRS Test Year revenue of

\$11,219,443. Please provide the RDU and the RBMC volumes associated with the Commission's projected PRS Test Year revenue. Include citations to the Commission's workpapers.