

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 SAMUEL J. KOROMA (OCA/USPS-T3-1-6)  
November 8, 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. 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-T3-1. The following interrogatory refers to your WP-PRS-6. In footnote [1], the second calculation referring to the Balloon row refers to “(Proposed Parcel Post Rates (WP-PRS-3, ...).” Please confirm that the WP-PRS-3 should be WP-PRS-2. If you are unable to confirm, please explain fully.

OCA/USPS-T3-2. The following interrogatory refers to your WP-PRS-6, items 4a, 4b, 4c and 4d. Please provide a copy of the Base Year RBMC zone distribution used in developing your estimated distributions for “PSRS RBMC” volumes.

OCA/USPS-T3-3. Please update your workpapers to reflect the Postal Rate Commission’s R2005-1 Opinion and Recommended Decision. If your workpapers are not impacted by any of the Commission’s decisions, please so state and provide an explanation.

OCA/USPS-T3-4. Section 561 of the DMCS states that the list of ancillary services (which includes the certificate of mailing) are available to Package Services mail, except for Parcel Post mail entered under the return services sections 521.27 or 521.28. Please confirm that the proposed change to the DMCS to add section 562 providing for a Certificate of Mailing service for Parcel Select Return Service, as shown in Attachment A, page 3 of the application herein, is not also reflected, but should be reflected, in the DMCS language for section 561. If you do not confirm, please explain.

OCA/USPS-T3-5. If you confirm OCA/USPS-T3-4, above, please indicate whether addition of the language in DMCS section 561 “(subject to section 562)” after “521.28” would satisfactorily remove the potential for confusion by an inconsistency of the proposed language in section 562 with section 561. If you do not confirm, please explain.

OCA/USPS-T3-6. 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. Your workpaper (WP-PRS-11) shows total FY2006 forecasted PSRS RDU revenue of \$6,752,195 and PSRS RBMC revenue of \$28,418,984, or total PSRS revenue of \$35,171,180.

- a. Please explain the reasons for the differences.
- b. Please update your workpapers to reflect the Commission’s Test Year volumes and revenues for PSRS parcels.