

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-T2-12-15)
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, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-12. The following refers to your testimony at 2. Both you and USPS witness Eggleston (Docket MC2003-2, USPS-T-2 at 3) make an assumption that the PRS acceptance costs for the RBMC and the RDU are identical because it was assumed that most PRS packages would be entered back into the mail stream via window service. Please provide the percent of total PRS parcels that were returned via: (1) window service, (2) left for carrier to pick-up, and (3) placed in a USPS collection box. If you are unable to provide this information, please fully explain and include in your response the rationale for continuing to assume that only window service costs need to be incorporated into your cost analysis as opposed to incorporating all three of the PRS parcel return options.

OCA/USPS-T2-13. Please refer to your testimony Attachment B, pages 2 and 3 of 4. You use a variability of 56.37% in calculating the Weight/Rate and Acceptance retail transaction time, respectively, and cite for support Docket No. R2005-1. Does the variability you use conform to the variability utilized by the Commission in establishing the rates recommended in the recent opinion in Docket No. R2005-1? If not, please, explain and provide the variability figure used by the Commission. Please include a citation to the Commission's opinion or workpapers.

OCA/USPS-T2-14. The following refers to return PRS parcels.

- a. At the PRS pick-up locations, is the original Third-Party vendor who entered the package into the USPS mail stream the one who retrieves the returned PRS parcel?

- b. At the PRS pick-up locations, is it the originating merchant, who originally shipped the PRC parcel through a third-party, the one who retrieves the returned PRS parcel?
- c. If both originating merchants and third-party vendors retrieve returned PRS parcels, please identify the percent of the total each picks up and the rationale for when and who picks up PRS parcels.

OCA/USPS-T2-15. Please update all exhibits, attachments and tables in your testimony to reflect the costs determined by the Postal Rate Commission in the Docket No. R2005-1 Opinion and Recommended Decision.