

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

PARCEL RETURN SERVICE

Docket No. MC2006-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-7-8) (ERRATA)**

The United States Postal Service hereby provides its responses to the following interrogatories of the Office of the Consumer Advocate, filed on November 8, 2005: OCA/USPS-7-8. On November 23, 2005, the Postal Service mistakenly filed a document containing answers to a different set of interrogatories. This instant filing should replace, in its entirety, the original response to OCA/USPS-7-8, filed on November 23, 2005.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 29, 2005

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OCA/USPS-7. Please provide a cross-walk between the statements of facts and conclusions in the USPS's Experimental Parcel Return Service's First (filed August 24, 2004), Second (filed February 28, 2005), and Third (August 22, 2005) Semiannual Data Reports A and B filed with the Commission and the usage of those facts and conclusions in each of the three testimonies filed in this docket. Please provide the department name and the individual's name and position title of those who managed the collection of data provided in the A and B reports.

RESPONSE:

Witness Miller (USPS-T-2) relied on the information contained in the data collection reports, as shown below. It should be noted, however, that some of the information contained in those reports is dated. The BMC survey was therefore conducted in order to collect data that reflected the most recent operations at the time the case was prepared.

First Report:

(1) Item A2. Total volume by BMC.

Used to develop coverage factors and average storage days.

(2) Item A3. BMC pickup frequency.

Used to develop average storage days.

(3) Item A4. Number and types of facilities used as pickup locations.

Used to develop coverage factors and average storage days.

(4) Item A5. Process flows.

Used to make adjustments to cost model as described in USPS-T-2, Section III.B.

Second Report:

(1) Item A2. Total volume by BMC.

Used to develop coverage factors and average storage days.

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(2) Item A3. BMC pickup frequency.

Used to develop average storage days.

(3) Item A4. Number and types of facilities used as pickup locations.

Used to develop coverage factors and average storage days.

(4) Item A5. Process flows.

Used to make adjustments to cost model as described in USPS-T-2, Section III.B.

(5) Item B1. Potential mail processing cost model adjustments.

Used to make adjustments to cost model as described in USPS-T-2, Section III.B.

(6) Item B4. Productivity data.

Updated productivity data were used as described in USPS-T-2, Section III.B. Those data are identical to the data relied upon in Docket No. R2005-1.

(7) Item B5 Sampling operations.

No changes have occurred to sampling procedures at this time. Consequently, the data relied upon in the experimental case were again relied upon in the instant proceeding.

(8) Item B6. Travel time estimate.

No changes have occurred to sampling procedures at this time. Consequently, the data relied upon in the experimental case were again relied upon in the instant proceeding.

(9) Item B8. Estimated storage days.

Used to develop average storage days.

(10) Item B10. Productivity data and space utilization.

The data appeared reasonable. Consequently, no changes were made to the cost model.

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Third Report:

(1) Item A2. Total volume by BMC.

Used to develop coverage factors and average storage days.

(2) Item A3. BMC pickup frequency.

Used to develop average storage days.

(3) Item A4. Number and types of facilities used as pickup locations.

Used to develop coverage factors and average storage days.

(4) Item A5. Process flows.

Used to make adjustments to cost model as described in USPS-T-2, Section III.B.

Witness Daniel (USPS-T-1) used the changes in the total volume by RDU and RBMC (A1) over the course of the experiment, as well as more current volume information, as a factor in Section III of her testimony forecasting volume for FY06. She also used the answers to A5, "Evaluation of whether the process flows match those used to estimate costs," A8, "Number of pieces addressed to an RDU but picked up at an RBMC, broken down into machinable, non-machinable, and oversized groups," and A11, "The number of shippers participating in Parcel Select PRS, broken down into shippers that participate solely in RBMC; solely in RDU; or participate in both" in Section II of her testimony. These answers support the findings from the experiment that the market has embraced the service and that the service is operationally feasible.

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Witness Koroma (USPS-T-3) relied on the following:

First Report:

Item No. A1 – Volume by RDU and RBMC, by weight and zone

Second Report:

Item No. A1 – Volume by RDU and RBMC, by weight and zone

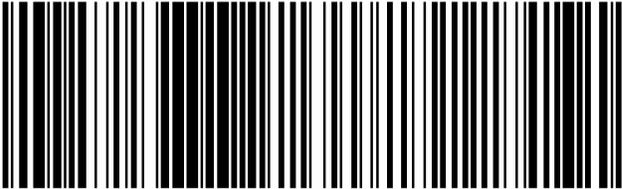
Third Report:

Item No. A1 – Volume by RDU and RBMC, by weight and zone

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OCA/USPS-8. In Docket No. MC2003-2, transcript volume 2 at 76-77, samples of the proposed RDU and RBMC labels are provided. Please provide a current sample of an RDU and an RBMC label. Include in your response a copy of the instructions provided by vendors to their customers on how to use the parcel return service label, where to deposit the returned parcel and any other instructions.

RESPONSE:

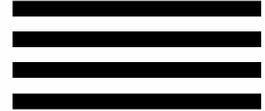
John Doe 1258 Return Ln Bethesda MD 20817	NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES
	
PARCEL SELECT RETURN SERVICE ABC RETURNS INC PERMIT NO. 77999	
BMC ZIP - USPS PARCEL RETURN SVC	AGENT / CLIENT NAME PARCEL RETURN SERVICE 56999
	X01
420 56999 9157 0268 3733 1000 0010 15	

Generic RBMC label

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John Doe
1258 Return Ln
Bethesda MD 20817

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES

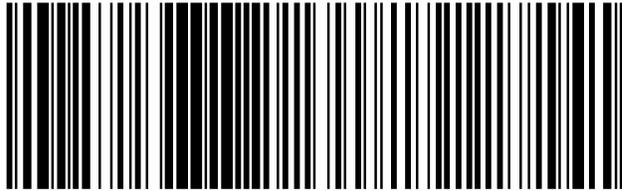


PARCEL SELECT RETURN SERVICE

ABC RETURNS INC

PERMIT NO. 77999

BMC ZIP - USPS PARCEL RETURN SVC



420 56999 9158 0268 3733 1000 0010 14

AGENT / CLIENT NAME
PARCEL RETURN SERVICE
56999

X01

Generic RDU label.

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Examples of common instructions include

“For easy returns affix the lefthand label to your package and give to US Postal Service. Please write your name on the return address portion of the label.”

“Affix the pre-paid SmartLabel below to the address side of your package. Remove any previous label or tape. Drop-off your at package at any US Mail location or give it to your local mail carrier.”

“SmartLabel is the prepaid preaddressed label below. Remove or cover the original shipping label. Affix the SmartLabel to package. Repack and enclose this form. Drop your package in the US Mail. If not using this label, please resend your package back via insured mail.”

“Detach SmartLabel above and tape to package. Remove any previous shipping labels from packaging. Drop return in any US Mail location - at home, work or blue drop box. The return fees below will be automatically deducted from your refund. Track your return at our website under My Account.”

“Cut out Merchandise Return label. Write your return address in the space provided in the upper-left corner of the label, after the word ‘FROM.’ Securely pack the items to be returned in a box, and, if possible, include the original packing slip in the package. Affix label squarely onto address side of parcel, covering up any previous delivery address and barcode without overlapping any adjacent side. Take the package to your nearest post office for delivery. No postage is necessary if the package is mailed from within the United States.”

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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