

# OFFICIAL TRANSCRIPT OF PROCEEDINGS BEFORE THE POSTAL RATE COMMISSION

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In the Matter of: )  
 )  
PARCEL RETURN SERVICE ) Docket No. MC2006-1

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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Parcel Return Service

Docket No. MC2006-1

DESIGNATION OF WRITTEN CROSS-EXAMINATION

Party

Interrogatories

**United States Postal Service**

**Sharon Daniel (USPS-T-1)**

Office of the Consumer Advocate

OCA/USPS-T1-1-9

OCA/USPS-T2-14 redirected to T1

Postal Rate Commission

PRC/USPS-POIR No.1 - Q4 redirected to T1

United States Postal Service

Direct Testimony of USPS Witness Sharon Daniel  
USPS-T-1

**Samuel J. Koroma (USPS-T-3)**

Office of the Consumer Advocate

OCA/USPS-T3-1-11

Postal Rate Commission

PRC/USPS-POIR No.1 - Q3 redirected to T3

United States Postal Service

Direct Testimony of USPS Witness Samuel J.  
Koroma USPS-T-3

**Michael W. Miller (USPS-T-2)**

Office of the Consumer Advocate

OCA/USPS-T2-1-12, 16-18

Postal Rate Commission

PRC/USPS-POIR No.1 - Q1-2, 5-6 redirected to  
T2

United States Postal Service

Direct Testimony of USPS Witness Michael W.  
Miller USPS-T-2

PartyInterrogatories**Institutional**

Office of the Consumer Advocate

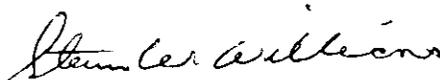
OCA/USPS-1-10

OCA/USPS-T2-13, 15 redirected to USPS

Postal Rate Commission

PRC/USPS-POIR No.1 - Q7

Respectfully submitted,

Steven W. Williams  
Secretary

INTERROGATORY RESPONSES  
DESIGNATED AS WRITTEN CROSS-EXAMINATION

Interrogatory

Designating Parties

**United States Postal Service**

**Sharon Daniel (USPS-T-1)**

OCA/USPS-T1-1	OCA
OCA/USPS-T1-2	OCA
OCA/USPS-T1-3	OCA
OCA/USPS-T1-4	OCA
OCA/USPS-T1-5	OCA
OCA/USPS-T1-6	OCA
OCA/USPS-T1-7	OCA
OCA/USPS-T1-8	OCA
OCA/USPS-T1-9	OCA
OCA/USPS-T2-14 redirected to T1	OCA
PRC/USPS-POIR No.1 - Q4 redirected to T1	PRC
Direct Testimony of USPS Witness Sharon Daniel USPS-T-1	USPS

**Samuel J. Koroma (USPS-T-3)**

OCA/USPS-T3-1	OCA
OCA/USPS-T3-2	OCA
OCA/USPS-T3-3	OCA
OCA/USPS-T3-4	OCA
OCA/USPS-T3-5	OCA
OCA/USPS-T3-6	OCA
OCA/USPS-T3-7	OCA
OCA/USPS-T3-8	OCA
OCA/USPS-T3-9	OCA
OCA/USPS-T3-10	OCA
OCA/USPS-T3-11	OCA
PRC/USPS-POIR No.1 - Q3 redirected to T3	PRC
Direct Testimony of USPS Witness Samuel J. Koroma USPS-T-3	USPS

InterrogatoryDesignating Parties**Michael W. Miller (USPS-T-2)**

OCA/USPS-T2-1	OCA
OCA/USPS-T2-2	OCA
OCA/USPS-T2-3	OCA
OCA/USPS-T2-4	OCA
OCA/USPS-T2-5	OCA
OCA/USPS-T2-6	OCA
OCA/USPS-T2-7	OCA
OCA/USPS-T2-8	OCA
OCA/USPS-T2-9	OCA
OCA/USPS-T2-10	OCA
OCA/USPS-T2-11	OCA
OCA/USPS-T2-12	OCA
OCA/USPS-T2-16	OCA
OCA/USPS-T2-17	OCA
OCA/USPS-T2-18	OCA
PRC/USPS-POIR No.1 - Q1 redirected to T2	PRC
PRC/USPS-POIR No.1 - Q2 redirected to T2	PRC
PRC/USPS-POIR No.1 - Q5 redirected to T2	PRC
PRC/USPS-POIR No.1 - Q6 redirected to T2	PRC
Direct Testimony of USPS Witness Michael W. Miller USPS-T-2	USPS

**Institutional**

OCA/USPS-1	OCA
OCA/USPS-2	OCA
OCA/USPS-3	OCA
OCA/USPS-4	OCA
OCA/USPS-5	OCA
OCA/USPS-6	OCA
OCA/USPS-7	OCA
OCA/USPS-8	OCA
OCA/USPS-9	OCA
OCA/USPS-10	OCA
OCA/USPS-T2-13 redirected to USPS	OCA
OCA/USPS-T2-15 redirected to USPS	OCA
PRC/USPS-POIR No.1 - Q7	PRC

**United States Postal Service**

**Sharon Daniel  
(USPS-T-1)**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-1. On page 2 of your testimony, you state, "Based on my understanding of the market, I expect significant growth to continue in FY 2006." Please fully explain what your understanding of the "market" is. In your response to this interrogatory, include cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.

RESPONSE:

As Manager, Ground Products, I stay abreast of industry trends by speaking with and attending conferences of associations/consultants, providers, and end users; and reviewing websites and articles.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-2. The following refers to your testimony at page 3, footnote 1. Please confirm that your reference to Docket No. MC2003-1 should be MC2003-2. If you are unable to confirm, please explain fully.

RESPONSE:

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-3. On page 4 of your testimony, you indicate that the USPS "assign[ed] each participant a unique Zip Code beginning with the prefix 569."

- a. For each of the two third-party participants currently using Parcel Return Service (PRS), is one and only one suffix assigned to a given third-party? For example, Third-party A is assigned a ZIP Code 56901; Third-Party B is assigned Zip Code 56902.
- b. If you are unable to confirm part a of this interrogatory, please provide specific details on the use and assignment of the 569 prefix.

RESPONSE:

- a. No.
- b. A company can request two unique ZIP Codes in order to better manage product flow. For example, Third-party A can be assigned 56901 for packages that it wants to be trapped at an RDU and 56915 for packages that it wants to flow to the RBMC. No other third party will be assigned these ZIP Codes. No more than one unique ZIP Code will be assigned to an agent for returns picked up at an RDU.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-4. Please refer to page 5 of your testimony. You state, "This shortcoming of the original label was remedied by removing the city and state and replacing it with a generic address block that simply states the agent's or merchant's name ...." At page 3 of your testimony, you indicate that there are only two third-party agents currently participating in the experiment.

- a. Currently, are all PRS packages being sent back to the third-party agent who originally placed the parcel into the USPS mail stream?
- b. If you are unable to confirm part a of this interrogatory, please specifically identify who is the recipient of a returned USPS PRS package and under what circumstances that recipient is (1) the merchant or (2) the third-party agent.

RESPONSE:

- a. No.
- b. The returned PRS packages are picked up by a third-party agent's logistics provider and transported to the agent's processing facility. The agent separates the packages by merchant and is responsible for appropriate disposition. Returned PRS packages do not have to be "originally placed into the USPS mail stream." Merchants can choose a different returns agent from the mail service provider that tenders their packages to the Postal Service for delivery. Packages delivered by a private carrier can also be returned using PRS.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-5. Please refer to page 7 of your testimony, lines 8 through 13.

- a. Please specifically identify how you arrive at your estimate of 12.8 million PRS pieces. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.
- b. Please specifically identify how you arrived at your estimate of 3.2 million RDU pieces. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.

RESPONSE:

- a. I projected a 4.0 million increase based on a general understanding of the market. This growth is consistent with the growth experienced between FY04 and FY05.
- b. I estimated 25% of 12.8 million packages, or 3.2 million pieces, will be picked up from RDUs in FY2006. With active RDUs in 61 districts, about 13% of PRS is picked up at the RDU. This percentage is expected to increase, because existing agents plan to increase the number of RDU pickup points in calendar year 2006 and expand into all eligible districts.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-6. The experimental Parcel Return Service allowed packages to be entered into the mail stream by "giv[ing] it to their carrier, plac[ing] it in a collection box, schedul[ing] a pickup or bringing it into any post office." (Docket No. MC2003-2, USPS-T1 at 11.)

- a. For FY 2005, please provide the total volume of PRS parcels entered into the mail stream via: (1) a carrier, (2) a collection box, (3) a pickup, and (4) a post office.
- b. Please provide the forecasted FY 2006 volumes of PRS parcels entered into the mailstream via (1) a carrier, (2) a collection box, (3) a pickup, and (4) a post office. Include in your response cites to all source documents, provide copies of all source documents not previously filed in this docket and show the derivation of all calculated values.

RESPONSE:

- a.-b. These data are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

The Commission's recent Decision has no impact upon my volume forecast. As witness Koroma responds in OCA/USPS-T3-6, the R2005-1 forecast reflected a "simplifying assumption." Please see Section III of my testimony for a detailed explanation of my Fiscal Year 2006 volume projection.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

- a. My understanding is that most merchants are self-insured and I am not aware of any merchants wishing to use postal insurance. One current participant has inquired about exploring the option of USPS offering postal insurance to consumers, but the USPS has not pursued this option.
- b. Yes, some unknown number of consumers have requested that insurance be added to the available special services and, in response, some merchants include the cost of insurance in the return handling fee and explain this in the instructions.
- c. Responsibility would have to be sorted out between the consumer, participant and merchant, based on the policy of the merchant and participant. The Postal Service does not assume responsibility for the loss, but can work with mailers to identify systemic loss issues.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T1-9.** In the Postal Rate Commissions' 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 RBMC volumes associated with the Commission's projected PRS Test Year revenue. Include citations to the Commission's workpapers.

**RESPONSE:**

I could not find this figure in the Commission's workpapers, but I did find it in USPS-LR-K-115, "USPST28BSpreadsheets.xls" on the tab named "PP-14 Adjusted TYAR Revenue" in row [s]. This revenue figure was derived from volumes found on the tab named "PP-12 TYAR Volumes." The associated volume is 0 RDU and 3,604,796 RBMC.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS MILLER

**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 (sic) parcel through a third-party, the one who retrieves the returned 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.*

**RESPONSE:**

- a. No. Please see response to OCA/USPS-T1-4.
- b. No originating merchants are participating directly in the program. All use third-party vendors.
- c. N/A

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DANIEL TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

4. Please refer to the response to OCA/USPS-T1-8c. The question asked which party is responsible when damage occurs to a returned parcel while in the custody of the Postal Service, to which witness Daniel responded, "The Postal Service does not assume responsibility for the loss, but can work with mailers to identify systemic loss issues."
- (a) If the USPS is not responsible for the loss/damage, which party typically is responsible for it?
  - (b) What percentage of returned parcels was lost or damaged while in the custody of the USPS during the experiment?
  - (c) What work has been done with mailers to identify systemic loss issues?

**RESPONSE:**

- a) A merchant and its agent determine responsibility between themselves in particular instances.
- b) Since the parcels do not carry postal insurance, the Postal Service has no data on loss or damage.
- c) There have been no systemic loss issues. In the event such a situation developed, the same procedures applicable to loss of any type of mail would be engaged, with the involvement of Postal Inspectors as appropriate.

USPS-T-1

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

PARCEL RETURN SERVICE

Docket No. MC2006-1

DIRECT TESTIMONY  
OF  
SHARON DANIEL  
ON BEHALF OF  
THE UNITED STATES POSTAL SERVICE

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1 stations. I have also consulted extensively on various operational and cost  
2 matters with postal headquarters and field personnel. I earned a Bachelor of  
3 Science Degree in Mathematics and a Master of Science Degree in Operations  
4 Research from the College of William and Mary in 1991 and 1992, respectively.

1 I. Purpose of Testimony

2 The purpose of this testimony is to provide information supporting the  
3 establishment of Parcel Select Return Bulk Mail Center (RBMC) and Return  
4 Delivery Unit (RDU) services as permanent rate classifications. I will discuss  
5 what the Postal Service has learned from the Parcel Return Service (PRS)  
6 experiment during the past two years, estimate FY2006 volumes by service type,  
7 and summarize the request for permanent PRS classifications. There are no  
8 workpapers or library references associated with this testimony. Witness Miller  
9 (USPS-T-2) and Witness Koroma (USPS-T-3) generally rely on my testimony  
10 regarding the product description and policy, as well as the volume projections  
11 developed in Section III.

12 Section II of this testimony addresses the findings from the PRS  
13 experiment. The experiment has met Postal Service expectations and validated  
14 assumptions about how the service would work. We found that the operational  
15 concept is sound and verified that the procedures for handling returned parcels  
16 function well. We made minor modifications that improved the product flow and  
17 made the service easier to use. Volume growth confirms market interest and  
18 indicates that Parcel Return Service can be a valuable addition to our product  
19 line.

20 Section III of this testimony addresses market factors that support the  
21 volume projection for Fiscal Year (FY) 2006. The volume for PRS has grown  
22 over the course of the experiment. As expected, there is some seasonality to the  
23 volume, but the total volume in year two of the experiment is nearly twice that of

1 year one. Based on my understanding of the market, I expect significant growth  
2 to continue in FY2006.

3 Section IV provides a synopsis of the Postal Service's proposal for a  
4 permanent classification. Based on the findings over the course of the  
5 experiment, the Postal Service proposes that the Parcel Select Return Service—  
6 Return Delivery Unit (RDU) Rate Category and the Parcel Select Return  
7 Service—Return Bulk Mail Center (RBMC) Rate Category become permanent  
8 classifications, and that Certificate of Mailing service be made available for  
9 purchase with this service. Because no participant has chosen to use the Bound  
10 Printed Matter Parcel Return Service, the Postal Service is not seeking a  
11 permanent classification for this category.

12

## 13 II. FINDINGS FROM THE EXPERIMENT

### 14 A. The Market Has Embraced the Service

15 The catalog and online retail market is searching for quick, easy,  
16 convenient, *no-postage-required* options for when their customers need to return  
17 merchandise. It is in the interest of merchants to improve the overall *return*  
18 process in order to encourage sales, and PRS provides a mechanism for that  
19 improvement. All of the merchants currently using this product do so through a  
20 *third party*, either a consolidator or returns management company. These third  
21 parties are providing value-added services including: *generating email messages*  
22 on behalf of the merchants as a device for building customer loyalty; the  
23 redirection of returns to locations selected by the merchants; and providing

1 information that helps the merchant manage inventories. They can also help  
2 smooth the otherwise unpredictable volume flow to the merchant, and better use  
3 their transportation capacities, since they may be dropping off outgoing packages  
4 at the PRS pickup facilities. The two current participants in the experiment  
5 represent scores of merchants and have handled over 13 million PRS returns for  
6 their clients. The Postal Service, by virtue of its extensive network, is well-  
7 positioned for a role in this returns process.

8         The experiment allowed for up to 30 participants in the second year to  
9 account for the possibility that merchants might want to use the service directly  
10 and not through a third party. None chose to do so; instead, the many  
11 participating merchants are using one of the two current third-party participants.  
12 The small number of participants in no way contradicts the market's embrace of  
13 this product.<sup>1</sup> These companies are continually seeking new clients, and are  
14 having success in so doing. There is also the possibility that additional third-  
15 parties will become PRS participants.<sup>2</sup>

16         Although the Postal Service expected RDU adoption to be slower than  
17 RBMC adoption, it ultimately had to wait until the spring of 2004 to enable RDU,  
18 consistent with the agents' readiness to use the service.<sup>3</sup> Both PRS participants

---

<sup>1</sup> Actual RBMC volume in FY05 of 8.6 million was 84 percent of the volume estimated before the experiment began. Docket No. MC2003-1, USPS-T-3 (10.2 million).

<sup>2</sup> Mergers and acquisitions in the consolidator industry also limited the number of actual and potential third-party users.

<sup>3</sup> As a result, RDU volumes have been below what was originally projected. RDU usage is expected to be entirely through third parties.

1 were using the RDU option by November 2004. The service is expanding to  
2 more delivery units as locations are identified that meet agents' expansion  
3 efforts. As these efforts continue, volume is expected to grow closer to the  
4 amount originally forecast and even exceed it.

5 The experimental classification for Bound Printed Matter (BPM) Parcel  
6 Return Service has not been used. Therefore it is not included in the proposal  
7 for a permanent classification.

8 B. The Service is Operationally Feasible

9 As reported in the interim reports filed with the Postal Rate Commission,  
10 the process flows that evolved during the experiment generally match those  
11 outlined in the filing for the experimental service.<sup>4</sup> Label modifications have  
12 improved operations and made the service easier to use for the merchants. The  
13 original plan called for assigning 21 unique, geographic-specific ZIP Codes for  
14 each BMC service area for the program. However, the Postal Service decided  
15 that it was more efficient to assign each participant a unique ZIP Code beginning  
16 with the prefix 569. Each BMC added the unique ZIP Codes to its sort plans. In  
17 many cases, the volume justified a unique runout, as described in witness Miller's  
18 testimony (USPS-T-3).

19 The original PRS label included the city and state of the BMC's physical  
20 address and the participant's unique 569 ZIP Code. Early in the experiment, it  
21 became apparent that this label could cause confusion: Employees noticed that

---

<sup>4</sup> See witness Miller's testimony (USPS-T-3) for a more detailed description of differences.

1 the first three digits in the ZIP Code did not match the location of the BMC, and  
2 occasionally modified the label to correct the perceived problem. This  
3 shortcoming of the original label was remedied by removing the city and state  
4 and replacing it with a generic address block that simply states the agent's or  
5 merchant's name, the words "Parcel Return Services" on one line and the words  
6 "Bulk Mail Center" on the next line along with the appropriate 569 ZIP Code for  
7 the participant. This had the added advantage of routing the return to the BMC  
8 serving the area where the parcel was entered. Occasionally, especially near  
9 BMC service area boundaries, a parcel may be entered in the service area of a  
10 BMC other than the one that would have been identified on the label.

11 A similar situation occurred with the original RDU label. The label included a  
12 specific facility address (including the street address, city and state) near the  
13 consumer's address. Later, the Postal Service and a participant tested a generic  
14 label that did not include the specific facility address, instead simply stating the  
15 merchant's or agent's name, "Parcel Return Services" on one line and the words  
16 "Return Delivery Unit" on the next line along with the agent's unique 569 ZIP  
17 Code. This generic label proved to be easier for merchants to reproduce and just  
18 as likely to be identified and captured at an RDU. Any post office that has been  
19 activated as an RDU can now trap and scan PRS pieces regardless of whether  
20 that delivery unit is the one that serves the consumer (and would have been  
21 listed on the label). Moreover, by removing the specific RDU address, we  
22 removed the possibility that a parcel not trapped at an RDU would somehow find  
23 its way back to the delivery unit, or "backflow" from the BMC. Instead, the parcel

1 will be trapped at the BMC and will be charged the RBMC rate. In summary, the  
2 labeling was greatly simplified by removing specific street addresses, and adding  
3 a generic address block that streamlines processing. This label allows more  
4 readily for pieces to be handled efficiently regardless of where the consumer  
5 enters the return into the mailstream.

6 Another label modification involved merging the RBMC and RDU labels into  
7 one PRS label by removing the need to designate the different services either in  
8 text or service type codes in the barcode. To participate in the service at a  
9 specific delivery unit, participants send a form (PS Form 3801 - Standing Delivery  
10 Order) to the delivery unit authorizing the unit to release the mail to a specified  
11 agent. If a delivery unit does not have a Standard Delivery Order for a given  
12 participant, the piece simply flows through the delivery unit and on to the BMC  
13 where it is trapped and picked up by the agent. The generic label also allows for  
14 the PRS piece to flow to the BMC in the event the piece is entered in a location  
15 that bypasses the delivery unit (and hence cannot be trapped there.)

16 The overall impact of the label modification was positive: PRS parcels not  
17 captured at RDUs are captured at the BMC; RDU parcels cannot backflow to the  
18 post office; and new RDUs can be activated without causing the merchants to  
19 change the label type that they provide to their customers.

20

### 21 III. VOLUME PROJECTION IN FISCAL YEAR 2006

22 A number of factors indicate that the number of returns, regardless of the  
23 parcel carrier used, is continuing to grow. In 2003, an estimated 34 million

1 households shopped online. This number is projected to grow to 63 million by  
2 2008.<sup>5</sup> Revenue from online sales grew 24 percent in 2004 and is expected to  
3 grow by a similar percentage in 2005 (excluding travel sales).<sup>6</sup> As online and  
4 catalog sales grow, so does the number of returns. For example, the return rate  
5 for online apparel purchases is approximately 35 percent, compared to only a 6  
6 percent return rate of retail apparel purchases.<sup>7</sup> With respect to PRS, in FY2004,  
7 4.4 million parcels generated \$13.3 million in revenue for the Postal Service. In  
8 FY2005, PRS volume was 8.8 million parcels, and generated \$25 million.<sup>8</sup>  
9 Based on the expectations of the current participants, and the possible addition  
10 of new agents in the future, I project significant growth for PRS in Test Year  
11 2006. Specifically, I estimate 12.8 million Parcel Select Parcel Return Service  
12 pieces. Of this, I project one-quarter, or 3.2 million pieces, will claim the RDU  
13 rate. The remaining 9.6 million will claim the RBMC rate.  
14

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<sup>5</sup> The State of Retailing On-Line 8.0: A Shop.org Study Conducted by Forrester Research. ([www.shop.org](http://www.shop.org)).

<sup>6</sup> The State of Retailing On-Line 8.0: A Shop.org Study Conducted by Forrester Research. ([www.shop.org](http://www.shop.org)).

<sup>7</sup> Going Backwards: Reverse Logistics Trends and Practices. Rogers, Dale S., Tibben-Limbke, Ronald S., Forester Research.

<sup>8</sup> Volume information was not reported in the bi-annual, interim reports submitted to the Postal Rate Commission because there were fewer than three participants. However, the two participants have agreed to allow the reporting of overall volumes in this proceeding in order to support the request to make Parcel Return Service a permanent classification.

1

## 2 IV. SUMMARY OF THE REQUEST THAT THE SERVICE CONTINUE

3 Through the PRS experiment, we have verified that the procedures for  
4 handling returned parcels function well, or have been modified to make them  
5 work better. We have also gained insight into the cost models used to establish  
6 the original pricing for the service. Customer participation confirms market  
7 interest in the service. Based on this knowledge, we would like the service to  
8 continue. Specifically, both the Bulk Mail Center and the Delivery Unit options of  
9 Parcel Select Parcel Return Service have garnered significant customer interest.

10 During the experiment, consumers were unable to purchase extra services  
11 for their returns, though I understand that, at times, some consumers wish to  
12 purchase a service that indicates that they have indeed mailed the return. To  
13 provide for these customers, I propose that Certificates of Mailing service be  
14 made available to consumers.<sup>9</sup>

15 Witness Koroma (USPS-T-3) provides the specific classification changes  
16 that the Postal Service is requesting.

---

<sup>9</sup> Some consumers may also seek insurance, but, since the Postal Service does not maintain custody of the parcel returns for the entire trip back to the merchant, we do not propose to offer insurance. Also, the label includes a barcode and human-readable code that can provide delivery information on usps.com, which makes offering Delivery Confirmation superfluous.

**POSTAL RATE COMMISSION  
DOCKET NO. MC2006-1  
PARCEL RETURN SERVICE**

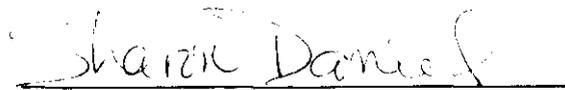
I, Sharon Daniel, hereby declare under penalty of perjury that:

The *Direct Testimony of Sharon Daniel on Behalf of the United States Postal Service*, denominated USPS-T-1, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

  
Sharon Daniel

1/5/06  
Date

**United States Postal Service**

**Samuel J. Koroma  
(USPS-T-3)**

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.

RESPONSE:

Confirmed.

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.

RESPONSE:

WP-PRS-6 refers to RDU cost savings calculations by weight. There is no reference to items 4a, 4b, 4c, and 4d in WP-PRS-6. However, assuming you are referring to items 4a, 4b, 4c, and 4d in WP-PRS-1 which describes RBMC zone distribution, the "Base Year" RBMC zone distribution is calculated from WP-PRS-3, which is a volume *distribution for the most recently available 4 quarters.*

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.

RESPONSE:

Updated workpapers are attached. My workpapers are not affected by the Commission's recommended decision with the exception of differences in volume forecast. Even though both the recommended rates and the rates proposed in this case are the same, this difference in volume forecast affects the calculated revenue.

## Updated Workpapers in Response to OCA/USPS-T3-3 and 6b

### Table of Contents

<b>Workbook Tab Designation</b>	<b>Workpaper</b>	<b>Workpaper Title</b>
Inputs	<u>WP-PRS-1</u>	Major Input Assumptions for Proposed Rate Schedule Determination
Proposed Parcel Post Rates	<u>WP-PRS-2</u>	R2005-1 Proposed Intra-BMC Parcel Post Rates
Current Volumes	<u>WP-PRS-3</u>	Distribution of Current Pieces by Zone and Weight
RBMC Forecast	<u>WP-PRS-4</u>	RBMC Forecast Volume Distribution
Volume Distribution	<u>WP-PRS-5</u>	R2005-1 TYAR Volumes
RDU Regular Size Savings Calculation	<u>WP-PRS-6</u>	Calculation of RDU Cost Savings by Weight
RBMC Regular Size Savings Calculation	<u>WP-PRS-7</u>	Distribution of RBMC Cost Savings by Weight
Oversized Cost Savings	<u>WP-PRS-8</u>	Oversized Mail Savings Calculation
Current PRS Rates	<u>WP-PRS-9</u>	Current Parcel Select Return Service Rates
Proposed PRS Rates	<u>WP-PRS-10</u>	Proposed Parcel Select Return Service Rates
Projected Revenue	<u>WP-PRS-11</u>	Projected Revenue
Revenue Impacts	<u>WP-PRS-12</u>	<i>Revenue Impacts</i>
Financial Summary	<u>WP-PRS-13</u>	Financial Summary

Total Estimated PSRS Volume	[1]	3,604,796
Nonmachinables Share of Total PSRS Volume	[2]	0.05563
Estimated PSRS RDU Volume	[3]	0
Estimated Zone Distributions for PSRS RBMC Volumes		
Zones 1&2	[4a]	75.7%
Zone 3	[4b]	15.0%
Zone 4	[4c]	7.3%
Zone 5	[4d]	2.0%
Unit Transportation Cost Impacts (\$/Cubic Foot)		
RDU Return Parcels (Compared to Local Intra-BMC)	[5]	-\$2.442
RBMC Machinable Parcels (Compared to Zoned Intra-BMC)	[6]	-\$2.212
Unit Non-Transportation Cost Impacts (\$/Piece)		
RDU Return Parcels (Compared to Intra-BMC Local)		
Machinable Parcels	[7]	-\$1.233
Nonmachinable Parcels	[8]	-\$4.600
Oversized Parcels	[9]	-\$11.126
RBMC Machinable Parcels (Compared to Intra-BMC)		
Machinable Parcels	[10]	-\$0.482
Nonmachinable Parcels	[11]	-\$1.002
Oversized Parcels	[12]	-\$1.536
Barcoding Cost Savings (\$/Piece)	[13]	\$0.03
Average Cubic Feet Per Piece		
RDU and RBMC Return Parcels		
Machinable Parcels	[14]	0.425
Nonmachinable Parcels	[15]	2.777
Oversized Parcels	[16]	7.938
USPS-LR-K-115 (Sheet PP-12): TYAR Volumes Share of Nonmachinable PRS Pieces from FY2004 RPW. USPS-LR-K-115 (Sheet PP-12): TYAR Volumes RBMC zone distribution based on Base Year Volumes. USPS-T-2, Attachment E, page 1, Column 1, RDU Parcels USPS-T-2, Attachment E, page 1, Column 1, RBMC Parcels USPS-T-2, Attachment A, RDU Machinable Parcels, Column 7 - Column 4. USPS-T-2, Attachment A, RDU Nonmachinable Parcels, Column 7 - Column 4. USPS-T-2, Attachment A, RDU Oversized Parcels, Column 7 - Column 4. USPS-T-2, Attachment A, RBMC Machinable Parcels, Column 7 - Column 4. USPS-T-2, Attachment A, RBMC Nonmachinable Parcels, Column 7 - Column 4. USPS-T-2, Attachment A, RBMC Oversized Parcels, Column 7 - Column 4. Docket No. R2005-1, USPS-LR-K-46 USPS-T-2, Attachment E, page 1, Column 2, Machinable Parcels. USPS-T-2, Attachment E, page 1, Column 2, Nonmachinable Parcels. USPS-T-2, Attachment E, page 1, Column 2, Oversized Parcels.		

**Intra-BMC Pieces<sup>[1]</sup>**

Weight (Pounds)	Local	Zones 1 & 2	Zone 3	Zone 4	Zone 5	Weight (Pounds)	Local	Zones 1 & 2	Zone 3	Zone 4	Zone 5
1	2.96	3.12	3.15	3.21	3.31	36	6.75	8.57	10.51	11.19	12.10
2	3.30	3.72	3.75	3.83	3.94	37	6.79	8.66	10.60	11.28	12.18
3	3.63	4.30	4.33	4.43	4.55	38	6.84	8.73	10.70	11.35	12.26
4	3.93	4.51	4.87	4.97	5.12	39	6.91	8.81	10.80	11.41	12.33
5	4.21	4.69	5.29	5.43	5.64	40	6.97	8.86	10.88	11.48	12.41
6	4.46	4.86	5.67	5.81	6.11	41	7.03	8.96	10.99	11.54	12.48
7	4.60	5.02	6.00	6.16	6.55	42	7.08	9.01	11.07	11.62	12.54
8	4.70	5.62	6.30	6.47	6.96	43	7.14	9.07	11.15	11.68	12.60
9	4.81	5.75	6.56	6.80	7.33	44	7.21	9.15	11.24	11.74	12.65
10	4.91	5.93	6.88	7.10	7.67	45	7.25	9.20	11.31	11.91	12.70
11	5.00	6.07	7.10	7.38	7.99	46	7.29	9.30	11.40	11.96	12.75
12	5.10	6.23	7.31	7.65	8.29	47	7.36	9.37	11.47	12.02	12.81
13	5.19	6.37	7.48	7.91	8.57	48	7.41	9.42	11.56	12.06	12.86
14	5.27	6.49	7.61	8.17	8.83	49	7.45	9.50	11.64	12.11	12.91
15	5.35	6.61	7.79	8.39	9.09	50	7.50	9.53	11.71	12.15	12.96
16	5.45	6.72	7.97	8.60	9.32	51	7.57	9.62	11.77	12.21	13.02
17	5.51	6.86	8.14	8.83	9.54	52	7.60	9.69	11.88	12.25	13.07
18	5.59	6.96	8.29	9.03	9.74	53	7.65	9.72	11.93	12.28	13.12
19	5.65	7.08	8.45	9.22	9.94	54	7.72	9.78	11.97	12.33	13.18
20	5.75	7.19	8.60	9.39	10.12	55	7.77	9.84	12.02	12.38	13.23
21	5.81	7.28	8.75	9.55	10.30	56	7.80	9.91	12.06	12.43	13.28
22	5.87	7.40	8.87	9.70	10.46	57	7.85	9.98	12.08	12.45	13.33
23	5.94	7.48	9.04	9.84	10.61	58	7.91	10.03	12.12	12.49	13.39
24	6.01	7.58	9.17	9.97	10.77	59	7.96	10.09	12.15	12.53	13.44
25	6.08	7.66	9.30	10.10	10.91	60	7.98	10.16	12.18	12.55	13.49
26	6.13	7.77	9.41	10.23	11.05	61	8.07	10.22	12.22	12.60	13.54
27	6.20	7.85	9.55	10.35	11.17	62	8.09	10.28	12.25	12.66	13.60
28	6.26	7.93	9.68	10.45	11.30	63	8.15	10.33	12.27	12.73	13.65
29	6.33	8.02	9.80	10.56	11.41	64	8.20	10.39	12.29	12.79	13.70
30	6.41	8.11	9.91	10.67	11.52	65	8.24	10.45	12.33	12.85	13.75
31	6.46	8.19	9.99	10.76	11.64	66	8.27	10.52	12.35	12.92	13.81
32	6.51	8.28	10.12	10.87	11.73	67	8.35	10.58	12.38	13.00	13.86
33	6.59	8.35	10.22	10.95	11.84	68	8.39	10.60	12.40	13.04	13.91
34	6.64	8.43	10.31	11.04	11.92	69	8.40	10.68	12.42	13.11	13.97
35	6.69	8.50	10.42	11.12	12.02	70	8.41	10.73	12.45	13.18	14.02
						Balloon	5.35	6.61	7.79	8.39	9.09
						Oversized	25.06	36.33	36.67	37.40	38.50

**Discounts and Surcharges (Per Piece)**

Nonmachinable Surcharges	
Intra-BMC	1.42
Barcode Discount	0.03

**Notes**

[1] Pieces weighing over 35 pounds must automatically add the nonmachinable surcharge.  
Source: Docket No. R2005-1, USPS-T-28, Exhibit 28A

RDU Pieces			RBMC Pieces												
Weight (Pounds)	RDU	Weight (Pounds)	RDU	Weight (Pounds)	RBMC Zones 1 & 2	RBMC Zone 3	RBMC Zone 4	RBMC Zone 5	RBMC Total	Weight (Pounds)	RBMC Zones 1 & 2	RBMC Zone 3	RBMC Zone 4	RBMC Zone 5	RBMC Total
1	10,981	36	1	1,788,258	394,465	196,343	49,475	2,428,541	155	36	41	34	12	242	
2	8,373	37	2	1,428,646	263,125	126,414	39,464	1,851,709	165	37	29	18	12	224	
3	4,488	38	3	753,939	143,671	56,096	18,799	992,505	123	38	31	26	12	192	
4	2,377	39	4	405,076	75,176	34,493	13,954	525,689	157	39	30	27	10	224	
5	1,255	40	5	215,056	39,391	18,554	6,856	279,859	135	40	26	16	16	187	
6	703	41	6	121,364	22,648	13,753	4,136	168,911	103	41	28	15	5	152	
7	476	42	7	73,743	13,765	6,498	2,362	96,368	100	42	13	15	2	130	
8	298	43	8	47,367	5,801	4,170	1,459	61,797	92	43	16	14	2	124	
9	141	44	9	32,302	5,844	2,983	1,047	42,176	61	44	16	13	5	92	
10	116	45	10	22,978	4,083	2,131	820	30,010	65	45	16	6	2	89	
11	77	46	11	16,344	3,097	1,556	615	23,522	57	46	17	8	1	83	
12	50	47	12	11,762	2,153	1,111	430	15,481	62	47	13	12	1	96	
13	33	48	13	7,873	1,601	801	327	10,564	42	48	13	7	1	72	
14	26	49	14	5,912	1,147	599	246	7,899	48	49	17	7	1	72	
15	17	50	15	4,420	877	481	188	5,966	50	50	11	9	1	68	
16	11	51	16	3,917	624	412	155	4,708	29	51	11	9	1	50	
17	7	52	17	2,939	547	326	150	3,822	47	52	6	5	2	60	
18	5	53	18	2,254	489	247	109	3,099	38	53	7	2	2	49	
19	3	54	19	1,953	394	232	101	2,680	24	54	5	2	1	31	
20	2	55	20	1,586	329	176	100	2,191	31	55	5	1	2	39	
21	1	56	21	1,429	305	159	90	1,983	32	56	5	2	2	41	
22	1	57	22	1,243	303	180	81	1,907	26	57	4	4	3	37	
23	1	58	23	1,187	304	143	72	1,706	24	58	5	2	2	33	
24	1	59	24	1,004	218	145	64	1,431	26	59	5	1	7	39	
25	1	60	25	892	235	115	53	1,295	19	60	3	2	1	25	
26	1	61	26	727	162	120	39	1,048	19	61	2	1	1	23	
27	1	62	27	611	142	99	42	894	20	62	3	1	1	24	
28	1	63	28	543	149	91	44	827	14	63	4	1	1	19	
29	1	64	29	422	136	70	32	660	6	64	2	2	1	9	
30	1	65	30	371	90	57	21	539	10	65	1	1	2	13	
31	1	66	31	286	80	53	33	452	7	66	4	1	2	14	
32	1	67	32	251	64	42	25	382	9	67	4	3	1	16	
33	1	68	33	222	52	41	11	326	11	68	1	1	1	11	
34	1	69	34	202	48	28	25	303	7	69	2	2	1	11	
35	1	70	35	168	46	31	11	256	1	70	1	2	1	4	
		Balloon							33					34	
		Oversized							39					18	
		Total							4,970,561					132,551	
									984,574					476,104	
									6,564,090						

**Notes**  
 RBMC volume data (July 2004- June 2005).  
 RDU volume data (January 2005-June 2005).  
 RDU weight distribution based on RBMC average weight distribution by weight steps  
 Source: PRS Experiment Data

RBMC Forecast Volumes <sup>(1)</sup>	
	Forecast Volumes <sup>(1)</sup> [A]
<b>RBMC</b>	
Zones 1&2	2,729,679
Zone 3	540,862
Zone 4	261,462
Zone 5	72,793
<b>Total</b>	<b>3,604,796</b>
<b>Notes</b>	
<p>[1] Calculation:  [<i>Aa</i>] to [<i>Ad</i>] = (WP-PRS-1, Inputs [<i>4a</i>] to [<i>4d</i>]) *  (Input [<i>1</i>] - Input [<i>3</i>]))  [<i>Ae</i>] = Sum of [<i>Aa</i>] to [<i>Ad</i>]</p>	



Calculation of Savings<sup>[1]</sup>

	Weight (Pounds)	Projected RDU-Volume- Weighted Intra-BMC Local Revenue [A]	Weight (Pounds)	Projected RDU-Volume- Weighted Intra-BMC Local Revenue [A]		Machinable Pieces [B]	Non- machinable Pieces [C]	Balloon- Rate Pieces [D]	All Regular- Size Pieces Combined [E]	
1	0	36	0	0						
2	0	37	0	0						
3	0	38	0	0						
4	0	39	0	0	[a]	Average Cubic Feet Per Piece	0.425	2.777	2.777	
5	0	40	0	0						
6	0	41	0	0	[b]	Transportation Savings (\$ Per Cubic Foot)	2.442	2.442	2.442	
7	0	42	0	0						
8	0	43	0	0	[c]	Transportation Savings (\$ Per Wt. Avg. Piece)	1.038	6.781	6.781	1.357
9	0	44	0	0						
10	0	45	0	0	[d]	Non Transportation Savings (\$ Per Piece)	1.233	4.600	4.600	1.420
11	0	46	0	0						
12	0	47	0	0	[e]	RDU Projected Regular-Sized Volumes	0	0	-	0
13	0	48	0	0						
14	0	49	0	0	[f]	Total RDU-Volume-Weighted Revenue Using Benchmark (Intra-BMC Local) Rates:				0
15	0	50	0	0						
16	0	51	0	0						
17	0	52	0	0	[g]	Weighted Average Benchmark Revenue Per Piece				3.489
18	0	53	0	0						
19	0	54	0	0	[h]	Weighted Average Savings Per Piece				2.778
20	0	55	0	0						
21	0	56	0	0	[i]	Proposed Price				2.11
22	0	57	0	0						
23	0	58	0	0						
24	0	59	0	0						
25	0	60	0	0						
26	0	61	0	0						
27	0	62	0	0						
28	0	63	0	0						
29	0	64	0	0						
30	0	65	0	0						
31	0	66	0	0						
32	0	67	0	0						
33	0	68	0	0						
34	0	69	0	0						
35	0	70	0	0						
			Balloon							

Notes

- [1] Calculation Column [A], rows 1 Pound to 70 Pounds = (Proposed Parcel Post Rates (WP-PRS-2), Intra-BMC Local Rate by weight) \* (Current Volumes (WP-PRS-4), RDU pieces by weight)
- Calculation Column [A], Balloon row = (Proposed Parcel Post Rates (WP-PRS-3), Intra-BMC Local 15-pound Rate) \* (Current Volumes (WP-PRS-4), RDU Balloon pieces)
- Source: [Ba] (WP-PRS-1, Input [14])  
[Ca], [Da] (WP-PRS-1, Input [15])  
[Bb] to [Db] (WP-PRS-1, Input [5])
- Calculation Row [c], Columns [B] to [D] = Row [a] \* Row [b], Columns [B] to [D]  
[Ec] = ([Bc]\*[Be] + [Cc]\*[Ce] + [Dc]\*[De]) / [Ee]
- Source: [Bd] (WP-PRS-1, Input [7])  
[Cd], [Dd] (WP-PRS-1, Input [8])
- Calculation [Ed] = ([Bd]\*[Be] + [Cd]\*[Ce] + [Dd]\*[De]) / [Ee]
- Calculation [Be] = (WP-PRS-1, Input [3]) \* (1 - (Current Volumes (WP-PRS-3), Sum of RDU Balloon and Oversize volumes) / (Current Volumes (WP-PRS-3), Total RDU volume)) \* (1 - WP-PRS-1, Input [2])  
[Ce] = [Be] / (1 - (WP-PRS-1, Input [2])) \* (WP-PRS-1, Input [2])  
[De] = (WP-PRS-1, Input [3]) \* (Current Volumes (WP-PRS-3), RDU Balloon volume) / (Current Volumes (WP-PRS-3), Total RDU volume)  
[Ee] = Sum of [Be], [Ce], [De]
- Calculation [Ef] = (Sum of Column [A], Rows 1 pound to Balloon)
- Calculation [Eg] = [Ef] / (Current Volumes (WP-PRS-3), Sum of RDU volumes for 1 pound to Balloon)
- Calculation [Eh] = [Ec] + [Ed]
- Calculation [Ei] Input [17] \* Current PRS Rate for RDU (\$2.00)

	Machinable Return BMC All Zones [A]	Nonmachinable Return BMC All Zones [B]
<b>Savings<sup>[1]</sup></b>		
Non-Transportation (Per Piece)	0.4820	1.0020
Transportation (Per Cubic Foot)	2.2120	2.2120
Cubic Feet Per Piece	0.4250	2.7770

Calculation of Savings <sup>[2]</sup>									
	Weight (Pounds)	Machinable Return BMC All Zones [A]	Nonmachinable Return BMC All Zones [B]	Weight (Pounds)	Nonmachinable Return BMC All Zones [B]		Pieces Weighing 1 to 35 Pounds [C]	Pieces Weighing Over 35 Pounds [D]	Balloon-Rate Pieces [E]
	1	1,292,742	380,542	36	697	RBMC			
	2	1,622,601	477,642	37	672				
	3	866,736	255,140	38	861		[d] Calculated Savings	6,266,301	7,647
	4	429,732	126,499	39	795				
	5	225,248	66,306	40	525		[e] Total Pieces	3,603,726	1,070
	6	127,642	37,574	41	402				
	7	79,911	23,523	42	426		[f] Average Savings/Piece	1.739	7.145
	8	52,303	15,396	43	246				
	9	35,365	10,410	44	320				
	10	26,011	7,657	45	148				
	11	19,007	5,595	46	164				
	12	14,285	4,205	47	156				
	13	11,303	3,327	48	164				
	14	8,255	2,430	49	156				
	15	5,901	1,737	50	205				
	16	5,048	1,486	51	164				
	17	3,653	1,078	52	90				
	18	2,738	806	53	98				
	19	2,254	664	54	131				
	20	1,825	537	55	82				
	21	1,388	409	56	115				
	22	1,261	371	57	139				
	23	1,060	312	58	115				
	24	689	203	59	82				
	25	701	206	60	49				
	26	589	173	61	74				
	27	518	152	62	66				
	28	462	136	63	90				
	29	455	134	64	86				
	30	347	102	65	25				
	31	330	97	66	74				
	32	247	73	67	41				
	33	213	63	68	57				
	34	213	63	69	90				
	35	165	49	70	66				
				Balloon	-				

**Notes**

[1] Source [Aa] WP-PRS-1 -Input [10]  
 [Ba] WP-PRS-1 -Input [11]  
 [Ab],[Bb] WP-PRS-1 -Input [6]  
 [Ac] WP-PRS-1 -Input [14]  
 [Bc] WP-PRS-1 -Input [15]

[2] Calculation Column [A], pounds 1 to 35 = ([Aa] + [Ab]\*[Ac]) \* (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 1-35)  
 \* (1 - (RBMC Volume Distribution (WP-PRS-6), RBMC Nonmachinable share under 36 pounds))  
 Column [B], pounds 1 to 35 = ([Ba] + [Bb]\*[Bc]) \* (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 1-35)  
 \* (RBMC Volume Distribution (WP-PRS-6), RBMC Nonmachinable share under 36 pounds)  
 Column [B], pounds 36 to 70, plus Balloon = ([Ba] + [Bb]\*[Bc]) \* (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 36 to 70, plus Balloon)

Calculation [Cd] = (Sum of Columns [A] and [B], pounds 1-35)  
 [Ce] = (Sum of RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, pounds 1-35)  
 [Cf] = [Cd] / [Ce]

Source [Cg], [Ch] (Assumed)

Calculation [Dd] = (Sum of Column [B], pounds 36-70)  
 [De] = (Sum of RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, pounds 36-70)  
 [Df] = [Dd] / [De]

Source [Dg], [Dh] (Assumed)

Calculation [Ed] = (Column [B], Balloon row)  
 [Ee] = (RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, Balloon row)  
 [Ef] = [Ed] / [Ee]

Unit Cost Savings <sup>[1]</sup>		[A]	
RDU Savings			
Non-Transportation (Per Piece)		\$	11.126
Transportation (Per Piece)		\$	19.385
Total		\$	30.51
RBMC Savings			
Non-Transportation (Per Piece)		\$	1.536
Transportation (Per Piece)		\$	17.559
Total		\$	19.09
<b>Notes</b>			
<p>[1] Source: [Aa]: (WP-PRS-1, Input [9])            Calculation: [Ab] = (WP-PRS-1, Input [5] * Input [16])            Calculation: [Ac] = ([Aa] + [Ab])            Source: [Ad]: (WP-PRS-1, Input [12])            Calculation: [Ae] = (WP-PRS-1, Input [6] * Input [16])            Calculation: [Af] = ([Ad] + [Ae])</p>			



Weight (Pounds)	RDU			RBMC									
	RDU [A]	Weight (Pounds)	RDU [A]	Weight (Pounds)	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 5 [E]	Weight (Pounds)	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 5 [E]
1	2.11	36	2.11	1	2.21	2.25	2.31	2.40	36	9.11	11.05	11.74	12.65
2	2.11	37	2.11	2	2.81	2.85	2.92	3.04	37	9.19	11.13	11.80	12.71
3	2.11	38	2.11	3	3.39	3.43	3.52	3.65	38	9.23	11.20	11.85	12.76
4	2.11	39	2.11	4	3.60	3.96	4.07	4.22	39	9.29	11.29	11.90	12.81
5	2.11	40	2.11	5	3.78	4.38	4.52	4.73	40	9.33	11.34	11.94	12.87
6	2.11	41	2.11	6	3.95	4.76	4.90	5.21	41	9.40	11.43	11.98	12.92
7	2.11	42	2.11	7	4.11	5.09	5.25	5.64	42	9.43	11.49	12.03	12.96
8	2.11	43	2.11	8	4.71	5.40	5.57	6.05	43	9.47	11.55	12.08	12.99
9	2.11	44	2.11	9	4.65	5.65	5.89	6.42	44	9.53	11.61	12.12	13.02
10	2.11	45	2.11	10	5.03	5.98	6.20	6.77	45	9.56	11.66	12.27	13.06
11	2.11	46	2.11	11	5.16	6.20	6.47	7.08	46	9.63	11.74	12.30	13.09
12	2.11	47	2.11	12	5.32	6.41	6.75	7.39	47	9.68	11.78	12.33	13.12
13	2.11	48	2.11	13	5.46	6.58	7.00	7.66	48	9.71	11.85	12.35	13.15
14	2.11	49	2.11	14	5.59	6.70	7.26	7.93	49	9.77	11.91	12.38	13.18
15	2.11	50	2.11	15	5.70	6.86	7.48	8.18	50	9.78	11.96	12.40	13.21
16	2.11	51	2.11	16	5.82	7.06	7.69	8.41	51	9.85	12.00	12.43	13.25
17	2.11	52	2.11	17	5.96	7.23	7.93	8.63	52	9.89	12.09	12.46	13.28
18	2.11	53	2.11	18	6.05	7.39	8.13	8.83	53	9.90	12.12	12.47	13.31
19	2.11	54	2.11	19	6.18	7.55	8.32	9.03	54	9.95	12.14	12.50	13.34
20	2.11	55	2.11	20	6.28	7.69	8.48	9.21	55	9.99	12.16	12.53	13.37
21	2.11	56	2.11	21	6.38	7.84	8.64	9.39	56	10.03	12.18	12.55	13.40
22	2.11	57	2.11	22	6.49	7.97	8.79	9.55	57	10.08	12.18	12.55	13.44
23	2.11	58	2.11	23	6.58	8.14	8.94	9.71	58	10.12	12.20	12.57	13.47
24	2.11	59	2.11	24	6.67	8.26	9.06	9.87	59	10.15	12.21	12.59	13.50
25	2.11	60	2.11	25	6.76	8.39	9.19	10.00	60	10.20	12.22	12.59	13.53
26	2.11	61	2.11	26	6.86	8.51	9.33	10.14	61	10.24	12.23	12.61	13.56
27	2.11	62	2.11	27	6.95	8.64	9.44	10.27	62	10.27	12.24	12.66	13.59
28	2.11	63	2.11	28	7.02	8.77	9.54	10.39	63	10.31	12.24	12.71	13.63
29	2.11	64	2.11	29	7.11	8.90	9.65	10.51	64	10.35	12.24	12.74	13.66
30	2.11	65	2.11	30	7.20	9.00	9.76	10.61	65	10.38	12.27	12.78	13.69
31	2.11	66	2.11	31	7.28	9.09	9.85	10.73	66	10.43	12.27	12.83	13.72
32	2.11	67	2.11	32	7.38	9.21	9.96	10.82	67	10.47	12.28	12.89	13.75
33	2.11	68	2.11	33	7.44	9.32	10.04	10.93	68	10.47	12.28	12.91	13.78
34	2.11	69	2.11	34	7.53	9.40	10.13	11.01	69	10.53	12.28	12.96	13.82
35	2.11	70	2.11	35	7.59	9.52	10.21	11.11	70	10.56	12.28	13.00	13.85
		Balloon <sup>(1)</sup> Oversized							Balloon <sup>(1)</sup> Oversized	27.39	27.73	28.46	29.56

Surcharge (Per Piece)<sup>(1)</sup>  
 Nonmachinable Surcharge (Nonmachinable pieces weighing less than 36 pounds)  
 RBMC Pieces 1.42

Notes

(1) Source: Docket No. R2005-1, USPS-T-28A, Table 6.

Summary of Projected Revenue													
[A]													
PSRS RDU													
PSRS RBMC 11,059,465													
TOTAL 11,059,465													
PRS Projected Revenue Detail <sup>(1)</sup>													
Weight (Pounds)	RDU [A]	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 5 [E]	Weight (Pounds)	RDU [A]	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 5 [E]		
1	-	1,568,152	370,808	163,173	41,489	36	-	606	203	40	116		
2	-	2,607,285	528,952	229,936	46,477	37	-	560	140	149	73		
3	-	1,704,280	328,380	138,615	25,745	38	-	699	295	163	59		
4	-	893,765	190,709	81,404	14,595	39	-	661	259	150	59		
5	-	491,310	110,575	47,333	9,354	40	-	417	286	41	-		
6	-	289,794	68,881	29,470	6,066	41	-	248	157	151	44		
7	-	185,930	47,919	21,000	4,691	42	-	281	185	124	45		
8	-	138,940	33,518	14,683	3,561	43	-	272	120	56	15		
9	-	96,142	24,194	10,601	2,695	44	-	273	120	56	15		
10	-	72,672	19,022	8,591	2,353	45	-	143	54	28	30		
11	-	52,982	13,654	7,014	1,925	46	-	133	40	14	15		
12	-	41,394	11,985	5,250	1,517	47	-	144	41	42	-		
13	-	31,352	9,722	4,296	1,643	48	-	134	95	14	-		
14	-	24,514	7,470	3,531	1,256	49	-	157	27	28	15		
15	-	17,981	5,106	2,857	929	50	-	202	55	43	-		
16	-	15,228	4,940	2,541	936	51	-	192	28	14	-		
17	-	11,397	3,566	1,838	772	52	-	42	42	28	-		
18	-	8,932	2,577	1,287	486	53	-	68	56	29	-		
19	-	7,075	2,425	1,212	601	54	-	80	84	29	-		
20	-	6,008	1,817	982	454	55	-	92	70	-	15		
21	-	4,552	1,574	664	399	56	-	92	70	-	-		
22	-	4,176	1,399	625	460	57	-	127	56	29	-		
23	-	3,487	1,401	492	312	58	-	70	84	29	-		
24	-	2,249	853	447	226	59	-	47	56	29	-		
25	-	2,233	1,020	453	206	60	-	47	28	-	-		
26	-	2,156	635	278	198	61	-	108	-	-	-		
27	-	1,858	555	357	165	62	-	82	-	15	-		
28	-	1,635	644	285	83	63	-	106	14	15	-		
29	-	1,582	704	277	84	64	-	83	14	-	-		
30	-	1,313	382	224	110	65	-	24	-	15	-		
31	-	1,102	407	350	148	66	-	96	14	-	-		
32	-	1,007	190	183	87	67	-	48	14	15	-		
33	-	734	321	173	88	68	-	48	14	30	-		
34	-	947	270	93	88	69	-	121	14	-	-		
35	-	618	218	141	51	70	-	85	14	-	-		
Total										8,303,336	1,802,397	782,960	170,772

**Notes**  
 Calculations for Projected Revenue  
<sup>(1)</sup> Calculation [A] to [E] = Proposed PSRS Rates (WP-PRS-10), \* R2005-1 TYAR Volumes (WP-PRS-5)

Summary of Revenue Impacts<sup>[1]</sup>

	[A]	
PSRS RDU		(0)
PSRS RBMC	(3,274,190)	

Return BMC Revenue Impact Detail<sup>[2]</sup>

	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]
1		(645,710)	(148,323)	(63,574)	(15,731)	36	(59)	(16)	(3)	(8)
2		(844,352)	(167,353)	(71,658)	(13,760)	37	(56)	(11)	(11)	(5)
3		(457,491)	(86,159)	(36,094)	(6,348)	38	(70)	(24)	(13)	(4)
4		(225,924)	(43,825)	(18,001)	(3,113)	39	(67)	(21)	(12)	(4)
5		(118,278)	(22,973)	(9,529)	(1,800)	40	(43)	(24)	(3)	-
6		(66,763)	(13,168)	(5,473)	(1,048)	41	(26)	(13)	(12)	(3)
7		(41,167)	(8,567)	(3,640)	(757)	42	(30)	(16)	(10)	(3)
8		(26,844)	(5,586)	(2,372)	(539)	43	(29)	(5)	(1)	-
9		(17,841)	(3,897)	(1,638)	(382)	44	(30)	(11)	(5)	(1)
10		(13,003)	(2,863)	(1,247)	(313)	45	(16)	(4)	(1)	(1)
11		(9,344)	(2,272)	(986)	(247)	46	(15)	(5)	(2)	(2)
12		(7,081)	(1,683)	(700)	(185)	47	(17)	(4)	(4)	-
13		(5,559)	(1,330)	(558)	(195)	48	(16)	(9)	(1)	-
14		(3,947)	(1,015)	(443)	(142)	49	(18)	(3)	(3)	(1)
15		(2,871)	(675)	(348)	(103)	50	(24)	(5)	(4)	-
16		(2,355)	(637)	(301)	(101)	51	(23)	(3)	(1)	-
17		(1,721)	(449)	(209)	(81)	52	(11)	(4)	-	-
18		(1,343)	(314)	(142)	(50)	53	(9)	(6)	(3)	-
19		(1,030)	(289)	(131)	(61)	54	(10)	(9)	(3)	(1)
20		(871)	(215)	(105)	(45)	55	(12)	(3)	-	-
21		(642)	(183)	(70)	(39)	56	(12)	(7)	-	(1)
22		(586)	(158)	(65)	(44)	57	(17)	(6)	(3)	-
23		(477)	(155)	(50)	(29)	58	(9)	(9)	(3)	-
24		(307)	(94)	(45)	(21)	59	(6)	(6)	(3)	-
25		(297)	(111)	(45)	(19)	60	(6)	(3)	-	-
26		(286)	(67)	(27)	(18)	61	(14)	-	-	-
27		(241)	(58)	(34)	(14)	62	(11)	-	(2)	-
28		(212)	(67)	(27)	(7)	63	(15)	(2)	(2)	-
29		(203)	(71)	(26)	(7)	64	(12)	(2)	-	-
30		(166)	(39)	(21)	(9)	65	(3)	-	(2)	-
31		(138)	(40)	(32)	(13)	66	(14)	(2)	-	-
32		(123)	(19)	(17)	(7)	67	(7)	-	(2)	-
33		(90)	(31)	(16)	(7)	68	(7)	(2)	(4)	-
34		(101)	(26)	(8)	(7)	69	(18)	(2)	-	-
35		(74)	(21)	(13)	(4)	70	(13)	(2)	-	-
						Balloon Oversized	-	-	-	-

Notes

- [1] Calculation [Aa] = (RDU Savings Calculation (WP-PRS-6) [Ee]) \* (Proposed PRS Rates (WP-PRS-10) 1-pound rate - RDU Savings Calculation (WP-PRS-6) [Eg]) + (WP-PRS-1, Input [3] - (RDU Savings Calculation (WP-PRS-7) [Ee])) \* (Proposed PRS Rates (WP-PRS-10) RDU Oversize Rate - Proposed Parcel Post Rates (WP-PRS-2) Intra-BMC Local Oversize Rate)
- [Ab] = Sum of Columns [A] to [D], 1-pound row to Oversized row
- [2] Calculation Columns [A] to [D], 1-pound to 35 pounds, and Oversize row = (Proposed PRS Rates (WP-PRS-10) Columns [B] to [E] - Proposed Parcel Post Rates (WP-PRS-2) Intra-BMC Zoned Rates) \* (Volume Distribution (WP-PRS-5) Return BMC Pieces Zones 1 to 5)
- Columns [A] to [D], 36-pounds to 70 pounds = (Parcel Select Returns Rates (WP-PRS-10) Columns [B] to [E] - Proposed Parcel Post Rates (WP-PRS-2) (Intra-BMC Zoned Rates + Intra-BMC Nonmachinable Surcharge)) \* (Volume Distribution (WP-PRS-5) Return BMC Pieces Zones 1 to 5)
- Columns [A] to [D], Balloon row = (Proposed PRS Rates (WP-PRS-10) Cols [B] to [E] Balloon row - Proposed Parcel Post Rates (WP-PRS-2) Intra-BMC Zoned 15-Pound Rates) \* (Volume Distribution (WP-PRS-5) RBMC Balloon Pcs. Zones 1 to 5)

	Volume <sup>[1]</sup> [A]	Projected Revenue <sup>[2]</sup> [B]	Cost Savings <sup>[3]</sup> [C]	Revenue Reduction <sup>[4]</sup> [D]	Savings Passthrough <sup>[5]</sup> [E]
Parcel Select RDU	0	\$0	\$0	\$0	0.0%
RBMC	3,604,796	\$11,059,465	\$6,376,076	\$3,274,190	51.4%
<b>Notes</b>					
<p>[1] Source: [Aa]: (WP-PRS-1, Input [3]) [Ab]: RBMC Forecast (WP-PRS-5), [Ae]</p> <p>[2] Calculation: [Ba] = (Projected Revenue Calculation (WP-PRS-11), [Aa]) [Bb] = (Projected Revenue Calculation (WP-PRS-11), [Bb])</p> <p>[3] Calculation: [Ca] = (RDU Savings Calculation (WP-PRS-7), [Ee]) * (RDU Savings Calculation (WP-PRS-6), [Ec] + [Ed]) + ((WP-PRS-1, Input [3]) - (RDU Savings Calculation (WP-PRS-6), [Ee])) * (Oversized Cost Savings (WP-PRS-8), [Aa] + [Ab])</p> <p>Calculation: [Cb] = (RBMC Savings Calculation (WP-PRS-7), [Cd] + [Dd] + [Ed]) + (RBMC Savings Calculation (WP-PRS-7), [Ce]) * (WP-PRS-1, Input [13]) * (1 - Volume Distribution RBMC (WP-PRS-6), RBMC Nonmachinables share &lt; 35 pounds) + (Oversized Cost Savings (WP-PRS-8), [Ae] + [Af]) * (Volume Distribution RBMC (WP-PRS-6), RBMC Total column, Oversized row)</p> <p>[4] Source: [Da] to [Db]: Revenue Impacts (WP-PRS-12), [Aa] to [Ab]</p> <p>[5] Calculation: [D] = [D] / [C]</p>					

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.

RESPONSE:

In our proposal, Section 560 was split into sections 561 and 562 in effort to clarify that Parcel Select Return Service (PSRS) is different from other Package Service categories, because the only ancillary service available for PSRS is Certificate of Mailing. Since the heading of section 561 specifically says "except for Parcel Select Return Service", technically there may be no need to note that Certificate of Mailing is available for PSRS in that section, especially since Section 562 follows immediately and states that Certificate of Mailing is available for PRS. Nonetheless, as evidenced by the interrogatory, this approach to the DMCS may not be as clear as it should be. The text of section 561 (rather than its title) would imply that Certificate of Mailing is not available for PSRS. One solution would be to amend line b by adding "(See Section 562 regarding availability for Parcel Select Return Service)". Another solution would be to keep section 560 intact, as in the current DMCS, but change the leading paragraph to read: "Package Services mail, except Parcel Select Return Service mail entered under sections 521.27 or 521.28 (which is eligible for Certificates of mailing only),...." This solution would seem to be the simplest and clearest approach.

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.

RESPONSE:

See my response to OCA/USPS-T3-4.

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.

RESPONSE:

- a. Since the rates in the Opinion and Recommended Decision are the same as those proposed in this case, the difference in the total revenue calculation is driven by volume forecast differences. In the omnibus rate filing, a simplifying assumption was made regarding PRS volume. A more specific volume projection was made in this docket by witness Daniel. See witness Daniel's testimony, MC2006-1, USPS-T-1, Section III for a detailed explanation of Fiscal Year 2006 volume projection.
- b. Please see my response to OCA/USPS-T3-3. Using the TYAR volumes from the Postal Rate Commission's Recommended Decision in Docket No. R2005-1, my workpapers generate a revenue calculation of \$11,059,465. This figure is different from the figure presented in this interrogatory (\$11,219,443) because the nonmachinable surcharges are calculated differently. The Commission's figure relies on the nonmachinable percentage as presented by the Postal Service in the omnibus filing. However, the calculation of the revenue from the nonmachinable surcharge was calculated slightly differently in my workpapers in this filing.

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**OCA/USPS-T3-7.** Your testimony at page 8 indicates that, based upon the proposed rates, the implicit savings passthroughs are 47 percent for RDU and 51 percent for RBMC. Your footnote 4 on the same page states the rate design approach underlying the current rates is used “to verify that the proposed prices are reasonable in light of the costs reported by witness Miller in this case.”

- a. Inasmuch as you do not specifically so state in your testimony, please indicate whether you believe the proposed prices are reasonable in light of the costs presented by witness Miller. Please explain.
- b. Please indicate whether you believe the proposed prices are reasonable assuming costs as revised by witness Miller to conform to Commission methodology applied in the Docket No. R2005-1 opinion. Please explain.
- c. Inasmuch as you do not specifically so state in your testimony, please indicate whether you believe the implicit savings passthroughs of 47 percent for RDU and 51 percent for RBMC are reasonable. Please explain.
- d. Please indicate whether you believe reasonable the implicit passthroughs as they may have been revised due to a revision of costs by witness Miller to conform to the Commission methodology applied in the Docket No. R2005-1 opinion. Please explain.
- e. Please indicate the range of percentages of implicit passthroughs you believe would be reasonable for this parcel return service.
- f. If recalculation of the cost savings causes the implicit passthrough percentages to be outside of the range of percentages you consider to be reasonable, would you recommend a modification of the rates proposed in this docket? Please explain.

**RESPONSE:**

- a. Please note that at pages 3-4, I state (emphasis added):

*I have analyzed and assessed the proposed rates using relevant portions of the pricing methodology developed by witness Kiefer in Docket No. MC2003-2 and considering the cost data filed by witness Miller in USPS-T-2 in this case. My assessment concluded that the proposed pricing is reasonable in the context of the specific history of, and data available for, PRS and the Postal Service’s omnibus pricing proposals.*

- b.-d. Given the circumstances I note in the above quotation, I believe that the proposed prices, including the implicit passthroughs, are reasonable, regardless of small changes in calculated passthroughs that might result from substituting the

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Commission's cost estimates for those presented in witness Miller's testimony in this case.

- e. It is not possible to provide a range of implicit passthroughs that would be reasonable since the implicit passthrough is just one of the factors I considered.
- f. Not applicable; please see my response to part (e).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KOROMA  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-8.** In your testimony at page 9, you calculate the savings passthrough percentage based upon the cost savings calculated by witness Miller and the "revenue differential" which your footnote 3, on page 8, indicates is the "difference between the Intra-BMC rates and the proposed PRS rates." Interrogatory OCA/USPS-T2-18 asks witness Miller to calculate the delivery cost savings. Please recalculate the savings passthrough as a result of adding to the total cost savings the delivery cost savings calculated by witness Miller.

**RESPONSE:**

Please see witness Miller's response to OCA/USPS-T2-16.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KOROMA  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-9.** Please provide the cost coverage of the proposed rates for both RDU and RBMC service assuming:

- a. Witness Miller's cost savings analysis using the Commission's costing methodology in Docket No. R20005-1.
- b. Witness Miller's costs savings analysis using the Commission's costing methodology in Docket No. R20005-1 and including carrier cost savings.

**RESPONSE:**

Since RDU and RBMC are categories within a subclass, and total costs are not measured for these categories in isolation from the subclass, I cannot calculate the requested implicit cost coverages.

**OCA/USPS-T3-10:** Please refer to your testimony at pages 8 and 9 where you determined the total savings based upon witness Miller's testimony of unit cost savings and you calculated the savings passthrough percentages for RDU and RBMC service. Please provide recalculated total savings and savings passthrough percentages for RDU and RBMC using the costs included in the supplemental responses of the Postal Service filed December 1, 2005 to interrogatories OCA/USPS-T2-13 & 15 which reflect the costs determined by the Postal Rate Commission in the Docket No. R2005-1 Opinion and Recommended decision.

**RESPONSE:**

**Parcel Return Service Cost Savings and Passthrough  
(PRC Costs)**

	Cost Savings	Revenue Differential	Savings Passthrough <sup>1</sup>
RDU	\$9,438,373	\$4,197,467	44.5%
RBMC	\$17,778,091	\$8,719,734	49.0%

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<sup>1</sup> Revenue differential divided by cost savings.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KOROMA  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-11.** In light of the Postal Service's supplemental responses to interrogatories OCA/USPS-T2-13 & 15, filed December 1, 2005, reflecting the costs determined by the Postal Rate Commission in its Docket No. R2005-1 Opinion and Recommended Decision, please provide appropriate adjustments to all of your exhibits and attachments and work papers associated with your testimony, to reflect the costs included in those supplemental responses of the Postal Service.

**RESPONSE:** Please see the attached workpapers.

### Table of Contents

<b>Workbook Tab Designation</b>	<b>Workpaper</b>	<b>Workpaper Title</b>
<i>Inputs</i>	<u>WP-PRS-1</u>	Major Input Assumptions for Proposed Rate Schedule Determination
Proposed Parcel Post Rates	<u>WP-PRS-2</u>	R2005-1 Proposed Intra-BMC Parcel Post Rates
Current Volumes	<u>WP-PRS-3</u>	Distribution of Current Pieces by Zone and Weight
RBMC Forecast	<u>WP-PRS-4</u>	RBMC Forecast Volume Distribution
<i>Volume Distribution</i>	<u>WP-PRS-5</u>	Distribution of Forecast PSRS RDU and RBMC Pieces by Zone and Weight
RDU Regular Size Savings Calculation	<u>WP-PRS-6</u>	Calculation of RDU Cost Savings by Weight
<i>RBMC Regular Size Savings Calculation</i>	<u>WP-PRS-7</u>	Distribution of RBMC Cost Savings by Weight
Oversized Cost Savings	<u>WP-PRS-8</u>	Oversized Mail Savings Calculation
Current PRS Rates	<u>WP-PRS-9</u>	<i>Current Parcel Select Return Service Rates</i>
Proposed PRS Rates	<u>WP-PRS-10</u>	Proposed Parcel Select Return Service Rates
Projected Revenue	<u>WP-PRS-11</u>	<i>Projected Revenue</i>
Revenue Impacts	<u>WP-PRS-12</u>	Revenue Impacts
Financial Summary	<u>WP-PRS-13</u>	Financial Summary

Total Estimated PSRS Volume	[1]	12,800,000
Nonmachinables Share of Total PSRS Volume	[2]	0.05563
Estimated PSRS RDU Volume	[3]	3,200,000
Estimated Zone Distributions for PSRS RBMC Volumes		
Zones 1&2	[4a]	75.7%
Zone 3	[4b]	15.0%
Zone 4	[4c]	7.3%
Zone 5	[4d]	2.0%
Unit Transportation Cost Impacts (\$/Cubic Foot)		
RDU Return Parcels (Compared to Local Intra-BMC)	[5]	-\$2.449
RBMC Machinable Parcels (Compared to Zoned Intra-BMC)	[6]	-\$2.218
Unit Non-Transportation Cost Impacts (\$/Piece)		
RDU Return Parcels (Compared to Intra-BMC Local)		
Machinable Parcels	[7]	-\$1.377
Nonmachinable Parcels	[8]	-\$5.168
Oversized Parcels	[9]	-\$12.343
RBMC Machinable Parcels (Compared to Intra-BMC)		
Machinable Parcels	[10]	-\$0.560
Nonmachinable Parcels	[11]	-\$1.108
Oversized Parcels	[12]	-\$1.647
Barcoding Cost Savings (\$/Piece)	[13]	\$0.03
Average Cubic Feet Per Piece		
RDU and RBMC Return Parcels		
Machinable Parcels	[14]	0.425
Nonmachinable Parcels	[15]	2.777
Oversized Parcels	[16]	7.938
USPS-T-1 Share of Nonmachinable PRS Pieces from FY2004 RPW. USPS-T-1 RBMC zone distribution based on Base Year Volumes. OCA/USPS-T2-15, Attachment E, page 1, Column 1, RDU Parcels OCA/USPS-T2-15, Attachment E, page 1, Column 1, RBMC Parcels OCA/USPS-T2-15, Attachment A, RDU Machinable Parcels, Column 7 - Column 4. OCA/USPS-T2-15, Attachment A, RDU Nonmachinable Parcels, Column 7 - Column 4. OCA/USPS-T2-15, Attachment A, RDU Oversized Parcels, Column 7 - Column 4. OCA/USPS-T2-15, Attachment A, RBMC Machinable Parcels, Column 7 - Column 4. OCA/USPS-T2-15, Attachment A, RBMC Nonmachinable Parcels, Column 7 - Column 4. OCA/USPS-T2-15, Attachment A, RBMC Oversized Parcels, Column 7 - Column 4. Docket No. R2005-1, USPS-LR-K-46 OCA/USPS-T2-15, Attachment E, page 1, Column 2, Machinable Parcels. OCA/USPS-T2-15, Attachment E, page 1, Column 2, Nonmachinable Parcels. OCA/USPS-T2-15, Attachment E, page 1, Column 2, Oversized Parcels.		

Calculation of Savings <sup>(1)</sup>									
	Weight (Pounds)	Projected RDU-Volume- Weighted Intra-BMC Local Revenue [A]	Weight (Pounds)	Projected RDU-Volume- Weighted Intra-BMC Local Revenue [A]		Machinable Pieces [B]	Non- machinable Pieces [C]	Balloon- Rate Pieces [D]	All Regular- Size Pieces Combined [E]
1		3,504,391	36	796					
2		2,978,943	37	741					
3		1,756,365	38	640					
4		1,007,156	39	755	[a]	Average Cubic Feet Per Piece	0.425	2.777	2.777
5		574,377	40	635					
6		345,513	41	521	[b]	Transportation Savings (\$ Per Cubic Foot)	2.449	2.449	2.449
7		216,106	42	449					
8		141,593	43	432	[c]	Transportation Savings (\$ Per Wt. Avg. Piece)	1.041	6.801	6.801
9		98,898	44	323					
10		71,833	45	315	[d]	Non Transportation Savings (\$ Per Piece)	1.377	5.168	5.168
11		57,335	46	295					
12		38,490	47	309	[e]	RDU Projected Regular-Size Volumes	3,021,939	178,010	17
13		26,728	48	246					
14		20,294	49	261	[f]	Total RDU-Volume-Weighted Revenue Using Benchmark (Intra-BMC Local) Rates:			10,948,820
15		15,560	50	249					
16		12,509	51	185					
17		10,266	52	222	[g]	Weighted Average Benchmark Revenue Per Piece			3.422
18		8,445	53	183					
19		7,382	54	117	[h]	Weighted Average Savings Per Piece			2.949
20		6,142	55	148					
21		5,817	56	156	[i]	Proposed Price			2.11
22		5,171	57	142					
23		4,940	58	127					
24		4,193	59	151					
25		3,838	60	97					
26		3,132	61	90					
27		2,702	62	95					
28		2,524	63	75					
29		2,037	64	36					
30		1,684	65	52					
31		1,423	66	56					
32		1,212	67	65					
33		1,047	68	45					
34		981	69	45					
35		835	70	16					
			Balloon	89					

Notes

- (1) Calculation: Column [A] rows 1 Pound to 70 Pounds = (Proposed Parcel Post Rates (WP-PRS-2); Intra-BMC Local Rate by weight) \* (Current Volumes (WP-PRS-3); RDU pieces by weight)
- Calculation: Column [A] Balloon row = (Proposed Parcel Post Rates (WP-PRS-2); Intra-BMC Local 15-pound Rate) \* (Current Volumes (WP-PRS-3); RDU Balloon pieces)
- Source: [Ba] (WP-PRS-1; input [14]); [Ca]; [Da] (WP-PRS-1; input [15]); [Bb] to [Db] (WP-PRS-1; input [5])
- Calculation: Row [c], Columns [B] to [D] = Row [a] \* Row [b], Columns [B] to [D]; [Ec] = ([Bc]\*[Be] + [Cc]\*[Ce] + [Dc]\*[De]) / [Ee]
- Source: [Bd] (WP-PRS-1; input [7]); [Cd]; [Dd] (WP-PRS-1; input [8]);
- Calculation: [Ed] = ([Bd]\*[Be] + [Cd]\*[Ce] + [Dd]\*[De]) / [Ee];
- Calculation: [Be] = (WP-PRS-1; input [3]) \* (1 - (Current Volumes (WP-PRS-3); Sum of RDU Balloon and Oversize Volumes) / (Current Volumes (WP-PRS-3); Total RDU volume)) \* (1 - WP-PRS-1; input [2]); [Ce] = [Be] / (1 - (WP-PRS-1; input [2]) \* (WP-PRS-1; input [2])); [De] = (WP-PRS-1; input [3]) \* (Current Volumes (WP-PRS-3); RDU Balloon volume) / (Current Volumes (WP-PRS-3); Total RDU volume); [Ee] = Sum of [Be], [Ce], [De]
- Calculation: [Ef] = (Sum of Column [A] Rows 1 pound to Balloon)
- Calculation: [Eg] = [Ef] / (Current Volumes (WP-PRS-3); Sum of RDU volumes for 1 pound to Balloon)
- Calculation: [Eh] = [Ec] + [Ed]
- Calculation: [Ei] = input [17] \* Current PRS Rate for RDU (\$2.00)



	Unit Cost Savings <sup>[1]</sup> [A]
<b>RDU Savings</b>	
Non-Transportation (Per Piece)	\$ 12.343
Transportation (Per Piece)	\$ 19.440
<b>Total</b>	<b>\$ 31.78</b>
<b>RBMC Savings</b>	
Non-Transportation (Per Piece)	\$ 1.647
Transportation (Per Piece)	\$ 17.606
<b>Total</b>	<b>\$ 19.25</b>
<b>Notes</b>	
<p>[1] Source: [Aa]: (WP-PRS-1, Input [9])                      Calculation: [Ab] = (WP-PRS-1, Input [5] * Input [16])                      Calculation: [Ac] = ([Aa] + [Ab])                      Source: [Ad]: (WP-PRS-1, Input [12])                      Calculation: [Ae] = (WP-PRS-1, Input [6] * Input [16])                      Calculation: [Af] = ([Ad] + [Ae])</p>	

	Volume <sup>[1]</sup> [A]	Projected Revenue <sup>[2]</sup> [B]	Cost Savings <sup>[3]</sup> [C]	Revenue Reduction <sup>[4]</sup> [D]	Savings Passthrough <sup>[5]</sup> [E]
Parcel Select RDU	3,200,000	\$6,752,195	\$9,438,373	\$4,197,467	44.5%
RBMC	9,600,000	\$28,418,984	\$17,778,091	\$8,719,734	49.0%
<b>Notes</b>					
<p>[1] Source: [Aa]: (WP-PRS-1, Input [3]) [Ab]: RBMC Forecast (WP-PRS-5), [Ae]</p> <p>[2] Calculation: [Ba] = (Projected Revenue Calculation (WP-PRS-11), [Aa]) [Bb] = (Projected Revenue Calculation (WP-PRS-11), [Bb])</p> <p>[3] Calculation: [Ca] = (RDU Savings Calculation (WP-PRS-7), [Ee]) * (RDU Savings Calculation (WP-PRS-6), [Ec] + [Ed]) + ((WP-PRS-1, Input [3]) - (RDU Savings Calculation (WP-PRS-6), [Ee])) * (Oversized Cost Savings (WP-PRS-8), [Aa] * [Ab]) Calculation: [Cb] = (RBMC Savings Calculation (WP-PRS-7), [Cd] + [Dd] + [Ed]) + (RBMC Savings Calculation (WP-PRS-7), [Ce]) * (WP-PRS-1, Input [13]) * (1 - Volume Distribution RBMC (WP-PRS-6), RBMC Nonmachinables share &lt; 35 pounds) + (Oversized Cost Savings (WP-PRS-8), [Aa] + [Af]) * (Volume Distribution RBMC (WP-PRS-6), RBMC Total column, Oversized row)</p> <p>[4] Source: [Da] to [Db]: Revenue Impacts (WP-PRS-12), [Aa] to [Ab]</p> <p>[5] Calculation: [D] = [D] / [C]</p>					

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BROMA  
TO PRESIDING OFFICERS INFORMATION REQUEST NO. 1**

3. Please refer to Excel workbook "USPS-T-3\_Workpapers," sheet "RDU Savings Calculation." Cells H16 to H50 follow the same basic equation template: (Intra-BMC rate for that weight class) \* (RDU volume associated with that weight class). Please confirm that the equation should have added the nonmachinable surcharge associated with Intra-BMC parcels that weigh 36 – 70 lbs. In other words, confirm that the equation for cells H16 to H50 should be: (Intra-BMC rate for that weight class + nonmachinable surcharge) \* (RDU volume associated with that weight class). If you do not confirm, please explain why the nonmachinable surcharge is not added in, even though it is applied for all Intra-BMC mail that weighs 36 – 70 lbs. If you do confirm, please provide conforming worksheets.

**RESPONSE:**

Confirmed. In addition, nonmachinable surcharge revenue for pieces weighing 1-35 pounds was inadvertently excluded. Adding that nonmachinable surcharge revenue increases the total RDU "revenue reduction" from \$4,197,467 to \$4,452,029 (as presented in USPS-T-3, WP-PRS-13). As a result, the RDU savings passthrough increases from 47.2 percent to 50.1 percent. Conforming worksheets are attached.

Attachment to response to POIR No. 1, question 3  
Page 1 of 3

Calculation of RDU Cost Savings by Weight					USPS-T-3 WP-PRS-6 REVISED 12/21/05			
Calculation of Savings <sup>(1)</sup>								
Weight (Pounds)	Projected RDU-Volume-Weighted Intra-BMC Local Revenue [A]	Weight (Pounds)	Projected RDU-Volume-Weighted Intra-BMC Local Revenue [A]		Machinable Pieces [B]	Non-machinable Pieces [C]	Balloon-Rate Pieces [D]	All Regular-Size Pieces Combined [E]
1	3 504 391	36	964					
2	2 978 943	37	897					
3	1 756 365	38	773					
4	1 007 156	39	910	[a]	Average Cubic Feet Per Piece	0 425	2 777	2 777
5	574 377	40	765					
6	345 513	41	626	[b]	Transportation Savings (\$ Per Cubic Foot)	2 442	2 442	2 442
7	216 106	42	539					
8	141 593	43	517	[c]	Transportation Savings (\$ Per Wt. Avg. Piece)	1 038	6 781	6 781
9	98 898	44	387					
10	71 833	45	376	[d]	Non Transportation Savings (\$ Per Piece)	1 233	4 600	4 600
11	57 335	46	352					
12	38 490	47	368	[e]	RDU Projected Regular-Size Volumes	3 021 939	178 010	17
13	26 728	48	293					
14	20 294	49	311	[f]	Total RDU-Volume-Weighted Revenue Using Benchmark (Intra-BMC Local) Rates			11 203 381
15	15 560	50	296					
16	12 509	51	219					
17	10 266	52	264	[g]	Weighted Average Benchmark Revenue Per Piece			3 501
18	8 445	53	217					
19	7 382	54	138	[h]	Weighted Average Savings Per Piece			2 778
20	6 142	55	175					
21	5 617	56	184	[i]	Proposed Price			2 11
22	5 171	57	167					
23	4 941	58	150					
24	4 193	59	178					
25	3 819	60	115					
26	3 132	61	106					
27	2 702	62	111					
28	2 524	63	89					
29	2 031	64	42					
30	1 684	65	61					
31	1 423	66	66					
32	1 212	67	76					
33	1 047	68	53					
34	981	69	53					
35	815	70	19					
		Balloon	89					

Notes

(1) Calculation: Column [A] rows 1 Pound to 70 Pounds = (Proposed Parcel Post Rates (WP-PRS-2) Intra-BMC Local Rate by weight) \* (Current Volumes (WP-PRS-3) RDU pieces by weight)  
 Calculation: Column [A] Balloon row = (Proposed Parcel Post Rates (WP-PRS-2) Intra-BMC Local 15-pound Rate) \* (Current Volumes (WP-PRS-3) RDU Balloon pieces)  
 Source: [B] (WP-PRS-1 Input [14])  
 [C] [D] (WP-PRS-1 Input [15])  
 [B] to [D] (WP-PRS-1 Input [5])  
 Calculation: Row [c] Columns [B] to [D] - Row [a] \* Row [b] Columns [B] to [D]  
 [E] = ([B]\*[B]) + ([C]\*[C]) + ([D]\*[D]) + [E]  
 Source: [B] (WP-PRS-1 Input [7])  
 [C] [D] (WP-PRS-1 Input [8])  
 Calculation: [E] = ([B]\*[B]) + ([C]\*[C]) + ([D]\*[D]) + [E]  
 Calculation: [B] = (WP-PRS-1 Input [3]) \* (1 - (Current Volumes (WP-PRS-3) Sum of RDU Balloon and Oversize volumes) / (Current Volumes (WP-PRS-3) Total RDU volume)) \* (WP-PRS-1 Input [2])  
 [C] = [B] / (1 - (WP-PRS-1 Input [2]) \* (WP-PRS-1 Input [2]))  
 [D] = (WP-PRS-1 Input [3]) \* (Current Volumes (WP-PRS-3) RDU Balloon volume) / (Current Volumes (WP-PRS-3) Total RDU volume)  
 [E] = Sum of [B], [C], [D]  
 Calculation: [E] = (Sum of Column [A] Rows 1 pound to Balloon)  
 Calculation: [E] = [E] / (Current Volumes (WP-PRS-3) Sum of RDU volumes for 1 pound to Balloon)  
 Calculation: [E] = [E] + [E]  
 Calculation: [E] Input [17] Current PRS Rate for RDU (\$2.00)

Attachment to response to POIR No. 1, question 3  
Page 2 of 3

Revenue Impacts										USPS-T-3 WP-PRS-12 REVISED 12/21/05
Summary of Revenue Impacts <sup>[1]</sup>										
[a]	PSRS RDU	(4,452,029)								
[b]	PSRS RBMC	(8,719,734)								
Return BMC Revenue Impact Detail <sup>[2]</sup>										
	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]
	1	(2,379,952)	(519,216)	(258,437)	(65,845)	36	(199)	(53)	(43)	(15)
	2	(1,901,353)	(346,339)	(168,321)	(44,047)	37	(215)	(38)	(24)	(16)
	3	(1,016,709)	(189,107)	(87,966)	(24,744)	38	(165)	(42)	(35)	(16)
	4	(539,107)	(100,050)	(45,388)	(14,418)	39	(216)	(41)	(37)	(14)
	5	(286,213)	(52,425)	(24,696)	(9,124)	40	(188)	(37)	(14)	(22)
	6	(161,521)	(30,142)	(14,324)	(5,444)	41	(148)	(40)	(21)	(9)
	7	(98,143)	(18,320)	(8,648)	(3,144)	42	(146)	(19)	(22)	(3)
	8	(63,040)	(11,584)	(5,489)	(1,942)	43	(137)	(24)	(21)	(3)
	9	(42,518)	(7,778)	(3,970)	(1,393)	44	(93)	(25)	(15)	(8)
	10	(30,242)	(5,374)	(2,805)	(1,079)	45	(101)	(25)	(9)	(3)
	11	(24,414)	(3,958)	(2,071)	(818)	46	(91)	(27)	(13)	(2)
	12	(15,660)	(2,834)	(1,489)	(566)	47	(101)	(26)	(8)	(5)
	13	(10,425)	(2,110)	(1,066)	(435)	48	(69)	(21)	(20)	(2)
	14	(7,782)	(1,520)	(797)	(324)	49	(81)	(29)	(12)	-
	15	(5,882)	(1,167)	(640)	(250)	50	(92)	(19)	(3)	(2)
	16	(4,629)	(830)	(548)	(206)	51	(50)	(19)	(16)	(2)
	17	(3,684)	(728)	(429)	(200)	52	(84)	(11)	(9)	(4)
	18	(3,000)	(644)	(325)	(145)	53	(69)	(13)	(4)	(4)
	19	(2,571)	(519)	(305)	(134)	54	(44)	(9)	(4)	-
	20	(2,111)	(438)	(214)	(133)	55	(58)	(9)	(2)	(4)
	21	(1,881)	(406)	(212)	(120)	56	(61)	(10)	(4)	(4)
	22	(1,654)	(399)	(240)	(108)	57	(50)	(8)	(8)	(6)
	23	(1,562)	(400)	(188)	(95)	58	(47)	(10)	(4)	(4)
	24	(1,136)	(290)	(193)	(84)	59	(52)	(10)	(2)	(14)
	25	(1,174)	(313)	(151)	(71)	60	(38)	(6)	(4)	(2)
	26	(968)	(213)	(158)	(52)	61	(39)	(4)	(2)	(2)
	27	(804)	(189)	(132)	(55)	62	(42)	(6)	(2)	-
	28	(723)	(198)	(121)	(58)	63	(29)	(8)	(2)	-
	29	(562)	(179)	(91)	(42)	64	(13)	-	(4)	(2)
	30	(494)	(120)	(76)	(28)	65	(22)	-	(2)	(4)
	31	(381)	(105)	(71)	(44)	66	(15)	(9)	(2)	(4)
	32	(310)	(85)	(56)	(33)	67	(20)	(9)	(7)	-
	33	(295)	(68)	(55)	(15)	68	(25)	-	-	-
	34	(266)	(64)	(37)	(33)	69	(16)	(5)	(5)	-
	35	(224)	(61)	(41)	(15)	70	(2)	(2)	(5)	-
						Balloon	(44)	-	(1)	-
						Oversized	(510)	(131)	(235)	(26)
Notes										
<p>[1] Calculation: [A] = (RDU Savings Calculation (WP-PRS-6) [E]) * (Proposed PRS Rates (WP-PRS-10) 1 pound rate - RDU Savings Calculation (WP-PRS-6) [E]) - (WP-PRS-1) Input [3] - (RDU Savings Calculation (WP-PRS-7) [E]) * (Proposed PRS Rates (WP-PRS-10) - RDU Oversize Rate - Proposed Parcel Post Rates (WP-PRS-2) - Intra-BMC Local Oversize Rate)</p> <p>[A] = Sum of Columns [A] to [D] 1 pound row to Oversized row</p> <p>[2] Calculation: Columns [A] to [D] 1-pound to 35 pounds and Oversize row          (Proposed PRS Rates (WP-PRS-10) Columns [B] to [E]) * (Proposed Parcel Post Rates (WP-PRS-2) - Intra-BMC Zoned Rates) * (Volume Distribution (WP-PRS-5) - Return BMC Parcel Zones 1 to 5) Columns [A] to [D] 36 pounds to 70 pounds          (Parcel Select Returns Rates (WP-PRS-10) Columns [B] to [E]) * (Proposed Parcel Post Rates (WP-PRS-2) - Intra-BMC Zoned Rates - Intra-BMC Nonmachinable Surcharge) * (Volume Distribution (WP-PRS-6) - Return BMC Parcel Zones 1 to 5) Columns [A] to [D] Balloon row          (Proposed PRS Rates (WP-PRS-10) Cols. [B] to [E]) Balloon row          (Proposed Parcel Post Rates (WP-PRS-2) - Intra-BMC Zoned 15 Pound Rates) * (Volume Distribution (WP-PRS-5) - RBMC Balloon Pcs. Zones 1 to 5)</p>										

Attachment to response to POIR No. 1, question 3  
Page 3 of 3

USPS-T-3 WP-PRS-13 REVISED 12/21/05						
Financial Summary						
		Volume <sup>(1)</sup> [A]	Projected Revenue <sup>(2)</sup> [B]	Cost Savings <sup>(3)</sup> [C]	Revenue Reduction <sup>(4)</sup> [D]	Savings Passthrough <sup>(5)</sup> [E]
[a]	Parcel Select RDU	3,200,000	\$6,752,195	\$8,889,600	\$4,452,029	50.1%
[b]	RBMC	9,600,000	\$28,418,984	\$16,982,312	\$8,719,734	51.3%
<b>Notes</b>						
<p>[1] Source: [Aa]: (WP-PRS-1, Input [3]) [Ab]: RBMC Forecast (WP-PRS-5), [Ae]</p> <p>[2] Calculation: [Ba] = (Projected Revenue Calculation (WP-PRS-11), [Aa]) [Bb] = (Projected Revenue Calculation (WP-PRS-11), [Bb])</p> <p>[3] Calculation: [Ca] = (RDU Savings Calculation (WP-PRS-7), [Ee]) * (RDU Savings Calculation (WP-PRS-6), [Ec] + [Ed]) + ((WP-PRS-1, Input [3]) - (RDU Savings Calculation (WP-PRS-6), [Ee])) * (Oversized Cost Savings (WP-PRS-8), [Aa] + [Ab]) Calculation [Cb] = (RBMC Savings Calculation (WP-PRS-7), [Cd] + [Dd] + [Ed]) + (RBMC Savings Calculation (WP-PRS-7), [Ce]) * (WP-PRS-1, input [13]) * (1 - Volume Distribution RBMC (WP-PRS-6), RBMC Nonmachinables share &lt; 35 pounds) + (Oversized Cost Savings (WP-PRS-8), [Ae] + [Af]) * (Volume Distribution RBMC (WP-PRS-6), RBMC Total column, Oversized row)</p> <p>[4] Source: [Da] to [Db]: Revenue Impacts (WP-PRS-12), [Aa] to [Ab]</p> <p>[5] Calculation: [D] = [D] / [C]</p>						

USPS-T-3

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

PARCEL RETURN SERVICES

Docket No. MC2006-1

DIRECT TESTIMONY  
OF  
SAMUEL J. KOROMA  
ON BEHALF OF  
THE UNITED STATES POSTAL SERVICE

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## 1 AUTOBIOGRAPHICAL SKETCH

2 My name is Samuel J. Koroma. I am an economist in Specialty Pricing,  
3 Pricing and Classification, in the United States Postal Service Marketing  
4 Department. I testified in Docket No. R2001-1 on the Postal Service's proposed  
5 fee and classification changes for selected special services (USPS-T-37). I also  
6 presented the Postal Service's proposal for a permanent Periodicals "Ride-Along"  
7 classification in the same docket (USPS-T-44). My primary responsibilities have  
8 included Parcel Post and other pricing issues. Most recently, I presented the  
9 Postal Service's pricing and classification proposal in Docket No. MC2005-1  
10 (USPS-T-4) for the experimental Premium Forwarding Service (PFS).

11 Prior to becoming a career postal employee, I worked in 1995 as an intern  
12 and later as an economic analyst for the National Mail Transportation Purchasing  
13 department of the United States Postal Service. My responsibilities included  
14 conducting various economic studies on the respective modes of transportation.

15 I earned a Master of Arts degree in Economics from Howard University,  
16 Washington, D.C., and also a Bachelor of Science degree in Economics from the  
17 University of Sierra Leone.

1 I. PURPOSE AND SCOPE OF TESTIMONY

2 The purpose of my testimony is to present and support the Postal Service's  
3 proposal for permanent classifications and rates for the Parcel Select portion of the  
4 experimental Parcel Return Services (PRS).<sup>1</sup> The Postal Service proposes to make  
5 permanent the experimental Return Bulk Mail Center (RBMC) and Return Delivery Unit  
6 (RDU) classifications that provide commercial mailers the ability to pick up their returned  
7 parcels in bulk, at a designated Bulk Mail Center (BMC) or a designated delivery unit.  
8 The testimony will discuss the rationale for the classification changes, the  
9 appropriateness of the proposed prices, the classification's potential impacts, and its  
10 consistency with the statutory classification criteria.

11

12 II. GUIDE TO TESTIMONY AND SUPPORTING DOCUMENTATION

13 Attached to my testimony are my workpapers. My testimony relies on the cost  
14 estimates presented by witness Miller (USPS-T-2), and the current PRS product  
15 description and volume projections presented by witness Daniel (USPS-T-1).

16 In addition, this testimony relies on information previously presented to the Postal  
17 Rate Commission in Docket No. R2005-1, which is referenced as necessary.

18

19 III OVERVIEW OF THE EXPERIMENT

20 The Postal Service developed Parcel Return Services (PRS) as a customer-  
21 friendly and more efficient means for consumers to return parcels to mail-order retailers.

1 The two-year experiment was recommended by the Commission and was implemented  
2 by the Postal Service on October 19, 2003. The experiment includes return services for  
3 both Parcel Select and Bound Printed Matter. Under the experimental classifications,  
4 commercial mailers or their third-party logistics providers participating in the experiment  
5 can choose to receive bulk delivery of returned parcels at a designated delivery unit or  
6 at a BMC. PRS was designed to be consistent with destination entry services provided  
7 at delivery units or bulk mail centers, so that PRS returned parcels could be picked up  
8 at the same facilities where outgoing packages are entered. As a result, some  
9 participants may benefit from the increased efficiency of dropping off and picking up  
10 parcels concurrently. The worksharing prices for PRS reflected the estimated net  
11 savings resulting from avoidance of transportation and processing to the merchant's  
12 return address.

13 As discussed in witness Daniel's testimony (USPS-T-1), only the Parcel Select  
14 rate categories have been used by mailers. The Bound Printed Matter categories did  
15 not garner any participation. As a result, no permanent return classification is being  
16 requested for Bound Printed Matter.

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<sup>1</sup> The proposed name for the permanent classification is Parcel Return Service (singular) rather than Parcel Return Services, which was used in the experiment, because it involved both Bound Printed Matter and Parcel Select.

1 IV. THE PROPOSAL

2 A. Summary

3 The Postal Service is proposing permanent classifications and rates for the  
4 Parcel Select Return Services RBMC and RDU rate categories. These are found in  
5 Attachments A and B to the Request. The Postal Service is proposing to maintain the  
6 current rate structures, including flat-rate pricing for regular-sized RDU. The Postal  
7 Service is also proposing the same prices that it proposed in the ongoing omnibus rate  
8 case, Docket No. R2005-1. Accordingly, the specific rate proposed for regular-sized  
9 RDU parcels is a flat price of \$2.11 (currently \$2.00) . Similarly, for RBMC parcels, the  
10 proposed rates are generally 5.4 percent higher than the current prices.

11 B. Rationale for Maintaining the Rates Proposed in Docket No. R2005-1

12 The rates proposed in this case are those presented in Docket No. R2005-1 by  
13 witness Taufique (USPS-T-28) and documented in Exhibit USPS-28A, Table 6. Those  
14 rates represent a 5.4 percent increase over current rates, similar to the changes  
15 proposed for other prices in the omnibus rate case. This approach would maintain  
16 consistency between the permanent PRS rates and all other rates. It would also avoid  
17 the disruption to the Postal Service and the mailers of potentially having the PRS rates  
18 change twice within a short period, once as a result of the omnibus case and then again  
19 as a result of this case.

20 I have analyzed and assessed the proposed rates using relevant portions of the  
21 pricing methodology developed by witness Kiefer in Docket No. MC2003-2 and  
22 considering the cost data filed by witness Miller in USPS-T-2 in this case. My  
23 assessment concluded that the proposed pricing is reasonable in the context of the

1 specific history of, and data available for, PRS and the Postal Service's omnibus pricing  
2 proposals. Subsequent omnibus filings will provide opportunities for a more typical  
3 evaluation of all prices, including PRS pricing.

#### 4 5 V. PRICING AND RATE DESIGN

6 As discussed in witness Daniel's testimony (USPS-T- 1), the RDU and the RBMC  
7 categories are fundamentally different from each other. Therefore, the separate pricing  
8 structures proposed by witness Kiefer in Docket No. MC2003-2 (USPS-T-3) and  
9 recommended by the Commission remain appropriate for the permanent classifications  
10 and rates proposed here.

#### 11 A. RDU Pricing and Rate Design

##### 12 1. Regular-sized Parcels

13 The proposed prices are \$2.11 for pieces of all weights and sizes, except  
14 "oversized" parcels. The simplified unitary pricing approach for regular-sized RDU  
15 parcels developed by witness Kiefer continues to be reasonable since there have been  
16 no significant departures from what was expected in the original PRS filing. A flat rate  
17 for RDU parcels avoids the complexities of weighing and rating each parcel.  
18 Additionally, the absence of a transportation component and the minimal mail  
19 processing involved in handling RDU pieces support the flat rate design. Such a rate  
20 structure is also easier to communicate and understand from both the customer's and  
21 Postal Service's perspective.

22 Estimates of transportation and non-transportation cost savings for RDU parcels  
23 compared to the benchmark, Parcel Post Intra-BMC local parcels, were provided by

1 witness Miller (USPS-T-2). To evaluate the proposed prices, I calculated the average  
2 per-piece savings for regular-sized RDU pieces, taking into account witness Miller's  
3 average cubic feet per piece estimates for machinable and nonmachinable parcels. I  
4 used the weight distribution of RBMC pieces to distribute RDU pieces (which do not  
5 have a weight component) to weight increment. Then, using the proposed benchmark<sup>2</sup>  
6 rates (local Intra-BMC rates), I estimated the revenue RDU pieces would have  
7 generated if those benchmark rates applied. I then divided this total revenue by the  
8 volume to get the revenue per piece for these RDU parcels (but at the Intra-BMC  
9 prices). Next, I calculated the average savings per piece using cost savings estimates  
10 from witness Miller, USPS-T-2. The results of these calculations are presented in  
11 workpaper WP-PRS-6. The financial implications are shown in workpaper WP-PRS-13  
12 and discussed in more detail in section VII.

## 13 2. Oversized Parcels

14 The proposed price for oversized RDU parcels is \$7.92. Oversized parcel cost  
15 savings estimates from witness Miller were used to evaluate this price. These savings  
16 calculations are shown in workpaper WP-PRS-8. The financial implications are shown  
17 in workpaper WP-PRS-13 and discussed in more detail in section VII.

---

<sup>2</sup> The term "benchmark" is usually used in conjunction with costs, however, for simplification, I am using it in my testimony when referring to rates, as well.

1           B.    RBMC Pricing and Rate Design

2                   1.    Regular-sized Parcels

3           The proposed RBMC prices are evaluated using cost savings estimates provided  
4   by witness Miller (USPS-T-2) and witness Kiefer's methodology in Docket No.  
5   MC2003-2, USPS-T-3.

6           Witness Miller (USPS-T-2) provides cost savings estimates for PRS in  
7   comparison to zoned Intra-BMC Parcel Post. The cost differences are provided for  
8   machinable and non-machinable parcels. Using current weight and zone distribution for  
9   RBMC parcels from the experiment and the cost savings estimates for machinable and  
10   nonmachinable parcels, I calculated the savings for machinable and nonmachinable  
11   RBMC parcels separately for light/medium weight pieces (those rated from 1-35  
12   pounds), heavier pieces (those rated over 35 pounds), and balloon rate pieces (see  
13   WP-PRS-7). Also, using the proposed PRS prices, I calculated the revenue in  
14   workpaper WP-PRS-11, and in workpaper WP-PRS-12 I subtracted the revenue that  
15   would have been generated by the intra-BMC Parcel Post prices to determine the  
16   revenue differential. The financial implications are shown in workpaper WP-PRS-13  
17   and discussed in more detail in section VII.

18                   2.    Oversized parcels

19           The proposed prices for oversized RBMC parcels were evaluated using witness  
20   Miller's (USPS-T-2) cost savings estimates for oversized RBMC parcels. These  
21   calculations are shown in workpaper WP-PRS-8. The financial implications are shown  
22   in workpaper WP-PRS-13 and discussed in more detail in section VII.

1 VI. RATIONALE FOR PERMANENT CLASSIFICATION

2 The experiment has yielded useful information that supports the establishment of  
3 a permanent classification for Parcel Select RDU and RBMC. In particular, response  
4 from customers has been favorable, volume is expected to grow, and the operational  
5 results have been positive.

6 A. Response to Experiment by Mailers

7 Having recognized that an easy and convenient returns process contributes to  
8 customers' loyalty and profitability, direct-to-customer commercial mailers are  
9 increasingly soliciting the services of reverse logistics providers to handle their returns.  
10 At the moment, there are two such providers participating in PRS; they represent many  
11 end users. The number of participants is expected to grow along with an increasing  
12 number of end users, as merchants try to optimize their return processes. See witness  
13 Daniel's testimony (USPS-T-1) for a more complete description of the market response  
14 to the experiment.

15 B. Expected Growth

16 PRS volume has doubled from the first year of the experiment to the second  
17 year, and is projected to grow significantly in fiscal year (FY) 2006. See witness  
18 Daniel's testimony (USPS-T-1), Section III, for a complete discussion on volume  
19 projections.

20 C. Operational Results

21 During the experiment, the Postal Service made a few operational modifications  
22 to improve ease of use for commercial mailers; it also simplified the product flow. As a  
23 whole, the two-year experiment has shown PRS to be operationally feasible from both

1 the Postal Service's and the customers' perspectives. See witness Daniel's testimony  
2 (USPS-T-1) for a more complete description of the operational results.

3

#### 4 VII. REVENUE, COST AND VOLUME IMPLICATIONS

5 Witness Daniel (USPS-T-1) provides projected FY 2006 RBMC and RDU  
6 volumes as follows:

7 RDU Pieces: 3.2 million

8 RBMC Pieces: 9.6 million

9 I used these volume projections in the calculation of the financial implications of  
10 the proposed rates. In earlier sections, I described how I calculated the effective  
11 revenue differential by comparing the proposed prices to the benchmark prices. The  
12 revenue differentials generated from RDU and RBMC are \$4,197,467 and \$8,719,734,  
13 respectively.<sup>3</sup> I also described how I used witness Miller's unit cost savings estimates to  
14 determine total savings estimates for RDU and RBMC. These estimated cost savings  
15 are \$8,889,600 and \$16,982,312 for RDU and RBMC, respectively. The resulting  
16 implicit passthroughs are therefore 47 percent and 51 percent for RDU and RBMC,  
17 respectively.<sup>4</sup> These calculations are derived in my workpaper WP-PRS-13 and shown  
18 in the table below.

---

<sup>3</sup> See workpaper WP-PRS-12. The "revenue differential" is the difference between the Intra-BMC rates and the proposed PRS rates.

<sup>4</sup> As described earlier, the proposed rates are consistent with the across-the-board approach used in Docket No. R2005-1. Therefore, the prices were not derived through a step-by-step rate design exercise that would have involved explicit selection of passthroughs. Instead, the rate design approach underlying the current rates is used to verify that the proposed prices are reasonable in light of the costs reported by witness Miller in this case.

### Parcel Return Service Cost Savings Passthroughs

	Cost Savings	Revenue Differential	Savings Passthrough <sup>5</sup>
RDU	\$8,889,600	\$4,197,467	47.2%
RBMC	\$16,982,312	\$8,719,734	51.3%

1           The overall revenue from the proposed categories is small relative to Parcel Post  
2 total revenue for test year 2006 reported in Docket No. R2005-1. Test Year after Rates  
3 Parcel Post revenue reported is approximately \$1.239 Billion.<sup>6</sup> Therefore, even with the  
4 growth projections from witness Daniel, revenue from PRS, at approximately \$35 million  
5 (See WP-PRS-11), would be only 2.8 percent of Parcel Post total revenue, and 0.05  
6 percent of total domestic mail revenue. Therefore, PRS should not materially affect  
7 Parcel Post's contribution to institutional costs relative to other subclasses. The  
8 proposed pricing has the effect of recognizing some, but not all, of the estimated cost  
9 differences that PRS enjoys, so the impact on contribution, though minimal, is positive.<sup>7</sup>

10

#### 11 VIII. CLASSIFICATION CRITERIA

12           Section 3623(c) of Title 39 U.S.C. requires the Commission to make its  
13 recommended decision on establishing a new classification in accordance with the  
14 following factors:

- 15           1. the establishment and maintenance of a fair and equitable classification  
16           system for all mail;

---

<sup>5</sup> Revenue differential divided by cost savings.

<sup>6</sup> Docket No. R2005-1, Exhibit USPS-27B.

<sup>7</sup> Total contribution from Parcel Post is expected to be over \$250,000,000.  
See Docket No. R2005-1, Exhibit USPS-27B.

- 2 2. the relative value to the people of the kinds of mail matter entered into the
- 3 postal system and the desirability and justification for special classifications
- 4 and services of mail;
- 5
- 6 3. the importance of providing classifications with extremely high degrees of
- 7 reliability and speed of delivery;
- 8
- 9 4. the importance of providing classifications which do not require an extremely
- 10 high degree of reliability and speed of delivery;
- 11
- 12 5. the desirability of special classifications from the point of view of both the user
- 13 and of the Postal Service; and
- 14
- 15 6. such other factors as the Commission may deem appropriate.
- 16

17 The proposed classification is fair and equitable (Criterion 1) to consumers, commercial  
 18 mailers, as well as the Postal Service without creating any undue disadvantage to either  
 '9 postal customers or postal competitors. It fosters a smooth return process for  
 20 consumers, and promotes a more efficient and less costly means of collecting returns  
 21 by commercial mailers. The creation of PRS provides value in that it enables another  
 22 option for the return of parcels. In this instance, it enables a return process that is more  
 23 efficient and convenient relative to other return mechanisms (Criterion 2). Given that  
 24 PRS is a category of Parcel Post, the degree of reliability and speed of delivery is  
 25 commensurate with that of Parcel Post; however, I would note that the worksharing  
 26 aspects of the service allow for increased reliability and speed of returns by enabling the  
 27 activity of the agents which expedites the return process (Criteria 3 and 4). In addition,  
 28 the proposed classification is desirable to the Postal Service, commercial mailers, and  
 29 their customers (Criterion 5), as described below. The Postal Service will have a  
 30 broader product line that better meets the needs of both commercial senders and  
 31 individual recipients. This is achieved through advantageous pricing for the commercial

1 customers and increased convenience for consumers who need to return items. The  
2 classification is desirable to the Postal Service in that these advantages are provided  
3 through worksharing arrangements that reduce the costs to the Postal Service. The  
4 end result is that both merchants and consumers benefit, while other customers are in  
5 no way disadvantaged.

6

#### 7 IX. DMCS CHANGES

8 I propose that the Commission recommend the Parcel Select RDU and RBMC  
9 rate categories as permanent classifications within the Parcel Post subclass at rates  
10 presented in Attachment B to the Request. Attachment A to the Request presents the  
11 proposed DMCS language. Sections 521.27 and 521.28, which describe the proposed  
12 Parcel Select rate categories, are maintained. Section 521.11, which describes the  
13 duration of the experiment for Parcel Select Return Service, is eliminated. Since a  
14 separate classification for Bound Printed Matter is not proposed, sections 522.27 and  
15 522.11, which describe the service for Bound Printed Matter and the duration of the  
16 experiment, are eliminated.

17 During the course of the experiment, as noted by witness Daniel, it was  
18 discovered that consumers occasionally seek a record of having mailed the return. In  
19 order to serve these customers, I propose that the existing Certificate of Mailing service  
20 be made available to consumers entering PRS parcels. The proposed DMCS language  
21 reflects this addition in section 562. The DMCS section regarding Certificates of Mailing  
22 is also amended to include availability for PRS through the addition of section 947.22.  
23 Sections 561 and 562 are added so that the Ancillary Services section for Package

1 Services can be split into two groupings: one section for all Package Services other  
2 than Parcel Return Service; and another section specifically for Parcel Return Service.

3 Several other sections are revised to note that the Bound Printed Matter option is  
4 not being proposed as a permanent classification, including 933.22b, 943.221b,  
5 944.21c, 945.221c, 948, 949, 951.21, 951.21b, and 2032. In most instances, these  
6 sections clarify that other special services are not available for Parcel Return Service,  
7 though they are available for other Package Services.

8 Section 570 is amended to delete Bound Printed Matter Return Service from the  
9 list of rates and fees within Package Services. The section retains the current listing for  
10 Parcel Select Return Services, though it deletes the plural form, "services."

11 Also, participants in this service are required to hold a permit and pay an  
12 accounting fee as described in section 585, which is amended to remove the reference  
13 to Bound Printed Matter Return Service. The permit and accounting fees proposed by  
14 witness Taufique (USPS-T-28) in Docket No. R2005-1 are proposed to apply.<sup>8</sup>

15 Attachment B to the Request has the proposed rate schedules. Schedule 522E  
16 is deleted. Also, fee schedule 1000 is presented to show that the applicable fees are  
17 proposed to increase to the level proposed in Docket No. R2005-1.

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<sup>8</sup> USPS-T-28, Exhibit USPS-28A Table 10.

**USPS-T-3  
WORKPAPERS**

### Table of Contents

<b>Workbook Tab Designation</b>	<b>Workpaper</b>	<b>Workpaper Title</b>
Inputs	<u>WP-PRS-1</u>	Major Input Assumptions for Proposed Rate Schedule Determination
<i>Proposed Parcel Post Rates</i>	<u>WP-PRS-2</u>	R2005-1 Proposed Intra-BMC Parcel Post Rates
Current Volumes	<u>WP-PRS-3</u>	Distribution of Current Pieces by Zone and Weight
RBMC Forecast	<u>WP-PRS-4</u>	RBMC Forecast Volume Distribution
<i>Volume Distribution</i>	<u>WP-PRS-5</u>	Distribution of Forecast PSRS RDU and RBMC Pieces by Zone and Weight
RDU Regular Size Savings Calculation	<u>WP-PRS-6</u>	Calculation of RDU Cost Savings by Weight
RBMC Regular Size Savings Calculation	<u>WP-PRS-7</u>	Distribution of RBMC Cost Savings by Weight
Oversized Cost Savings	<u>WP-PRS-8</u>	Oversized Mail Savings Calculation
Current PRS Rates	<u>WP-PRS-9</u>	Current Parcel Select Return Service Rates
Proposed PRS Rates	<u>WP-PRS-10</u>	Proposed Parcel Select Return Service Rates
Projected Revenue	<u>WP-PRS-11</u>	Projected Revenue
<i>Revenue Impacts</i>	<u>WP-PRS-12</u>	Revenue Impacts
Financial Summary	<u>WP-PRS-13</u>	Financial Summary

Major Input Assumptions for Proposed Rate Schedule Determination		USPS-1-3 WP-PRS-1
Input Assumption	Notes	Value
Total Estimated PSRS Volume	[1]	12,800,000
Nonmachinables Share of Total PSRS Volume	[2]	0.05563
Estimated PSRS RDU Volume	[3]	3,200,000
Estimated Zone Distributions for PSRS RBMC Volumes	[4a] [4b] [4c] [4d]	75.7% 15.0% 7.3% 2.0%
Unit Transportation Cost Impacts (\$/Cubic Foot)	[5]	-\$2,442
RDMC Machinable Parcels (Compared to Zoned Intra-BMC)	[6]	-\$2,212
Unit Non-Transportation Cost Impacts (\$/Piece)	[7]	-\$1,233
RDU Return Parcels (Compared to Intra-BMC Local)	[8]	-\$4,600
Machinable Parcels	[9]	-\$11,126
Nonmachinable Parcels	[10]	-\$0,482
Machinable Parcels	[11]	-\$1,002
Overized Parcels	[12]	-\$1,536
Barcoding Cost Savings (\$/Piece)	[13]	\$0.03
Average Cubic Feet Per Piece	[14]	0.425
RDU and RBMC Return Parcels	[15]	2,777
Machinable Parcels	[16]	7,938
Overized Parcels	[17]	

Notes
1 USPS-1-1
2 Share of Nonmachinable PRS Pieces from FY2004 RW.
3 USPS-1-1
4 RBMC zone distribution based on Base Year Volumes.
5 USPS-1-2, Attachment E, page 1, Column 1, RDU Parcels
6 USPS-1-2, Attachment E, page 1, Column 1, RBMC Parcels
7 USPS-1-2, Attachment A, RDU Machinable Parcels, Column 7 - Column 4.
8 USPS-1-2, Attachment A, RDU Nonmachinable Parcels, Column 7 - Column 4.
9 USPS-1-2, Attachment A, RDU Overized Parcels, Column 7 - Column 4.
10 USPS-1-2, Attachment A, RBMC Machinable Parcels, Column 7 - Column 4.
11 USPS-1-2, Attachment A, RBMC Nonmachinable Parcels, Column 7 - Column 4.
12 USPS-1-2, Attachment A, RBMC Overized Parcels, Column 7 - Column 4.
13 Docket No. R2005-1, USPS-LR-K-46
14 USPS-1-2, Attachment E, page 1, Column 2, Machinable Parcels.
15 USPS-1-2, Attachment E, page 1, Column 2, Nonmachinable Parcels.
16 USPS-1-2, Attachment E, page 1, Column 2, Overized Parcels.

USPS-T-3 WP-PRS-2											
R2005-1 Proposed Intra-BMC Parcel Post Rates											
Intra-BMC Pieces <sup>[1]</sup>											
Weight (Pounds)	Local	Zones 1 & 2	Zone 3	Zone 4	Zone 5	Weight (Pounds)	Local	Zones 1 & 2	Zone 3	Zone 4	Zone 5
1	2.96	3.12	3.15	3.21	3.31	36	6.75	8.57	10.51	11.19	12.10
2	3.30	3.72	3.75	3.83	3.94	37	6.79	8.66	10.60	11.28	12.18
3	3.63	4.30	4.33	4.43	4.55	38	6.84	8.73	10.70	11.35	12.26
4	3.93	4.51	4.87	4.97	5.12	39	6.91	8.81	10.80	11.41	12.33
5	4.21	4.69	5.29	5.43	5.64	40	6.97	8.86	10.88	11.48	12.41
6	4.46	4.86	5.67	5.81	6.11	41	7.03	8.96	10.99	11.54	12.48
7	4.60	5.02	6.00	6.16	6.55	42	7.08	9.01	11.07	11.62	12.54
8	4.70	5.62	6.30	6.47	6.96	43	7.14	9.07	11.15	11.68	12.60
9	4.81	5.75	6.56	6.80	7.33	44	7.21	9.15	11.24	11.74	12.65
10	4.91	5.93	6.88	7.10	7.67	45	7.25	9.20	11.31	11.81	12.70
11	5.00	6.07	7.10	7.38	7.99	46	7.29	9.30	11.40	11.86	12.75
12	5.10	6.23	7.31	7.65	8.29	47	7.36	9.37	11.47	12.02	12.81
13	5.19	6.37	7.48	7.91	8.57	48	7.41	9.42	11.56	12.06	12.86
14	5.27	6.49	7.61	8.17	8.83	49	7.45	9.50	11.64	12.11	12.91
15	5.35	6.61	7.79	8.39	9.09	50	7.50	9.53	11.71	12.15	12.96
16	5.45	6.72	7.97	8.60	9.32	51	7.57	9.62	11.77	12.21	13.02
17	5.51	6.86	8.14	8.83	9.54	52	7.60	9.69	11.88	12.25	13.07
18	5.59	6.96	8.29	9.03	9.74	53	7.65	9.72	11.93	12.28	13.12
19	5.65	7.08	8.45	9.22	9.94	54	7.72	9.78	11.97	12.33	13.18
20	5.75	7.19	8.60	9.39	10.12	55	7.77	9.84	12.02	12.38	13.23
21	5.81	7.28	8.75	9.55	10.30	56	7.80	9.91	12.06	12.43	13.28
22	5.87	7.40	8.87	9.70	10.46	57	7.85	9.98	12.08	12.45	13.33
23	5.94	7.48	9.04	9.84	10.61	58	7.91	10.03	12.12	12.49	13.39
24	6.01	7.58	9.17	9.97	10.77	59	7.96	10.09	12.15	12.53	13.44
25	6.08	7.66	9.30	10.10	10.91	60	7.98	10.16	12.18	12.55	13.49
26	6.13	7.77	9.41	10.23	11.05	61	8.07	10.22	12.22	12.60	13.54
27	6.20	7.85	9.55	10.35	11.17	62	8.09	10.28	12.25	12.66	13.60
28	6.26	7.93	9.68	10.45	11.30	63	8.15	10.33	12.27	12.73	13.65
29	6.33	8.02	9.80	10.56	11.41	64	8.20	10.39	12.29	12.79	13.70
30	6.41	8.11	9.91	10.67	11.52	65	8.24	10.45	12.33	12.85	13.75
31	6.46	8.19	9.99	10.76	11.64	66	8.27	10.52	12.35	12.92	13.81
32	6.51	8.28	10.12	10.87	11.73	67	8.35	10.58	12.38	13.00	13.86
33	6.59	8.35	10.22	10.95	11.84	68	8.39	10.60	12.40	13.04	13.91
34	6.64	8.43	10.31	11.04	11.92	69	8.40	10.68	12.42	13.11	13.97
35	6.69	8.50	10.42	11.12	12.02	70	8.41	10.73	12.45	13.18	14.02
						Balloon	5.35	6.61	7.79	8.39	9.09
						Oversized	25.06	36.33	38.67	37.40	38.50
<b>Discounts and Surcharges (Per Piece)</b>											
Nonmachinable Surcharges											
Intra-BMC 1.42											
Barcode Discount 0.03											
<b>Notes</b>											
[1] Pieces weighing over 35 pounds must automatically add the nonmachinable surcharge. Source: Docket No. R2005-1, USPS-T-28, Exhibit 28A											

**Distribution of Current Volumes by Zone and Weight [1]**

USPS T-3  
WP-PRB-3

RDU Pieces		RBMC Pieces													
Weight (Pounds)	RDU	Weight (Pounds)	RDU	Weight (Pounds)	RBMC Zones 1 & 2	RBMC Zone 3	RBMC Zone 4	RBMC Zone 5	RBMC Zone 6	Weight (Pounds)	RBMC Total	RBMC Zone 3	RBMC Zone 4	RBMC Zone 5	RBMC Total
1	10,981	36	1	1,768,256	394,465	186,343	49,475	2,428,541	36	155	41	34	12	242	
2	8,373	37	2	1,426,646	263,125	126,474	33,464	1,851,709	37	185	29	16	12	224	
3	4,488	38	3	753,939	143,871	66,096	18,799	992,505	36	123	31	26	12	192	
4	2,377	39	4	405,078	75,178	34,483	10,954	525,688	39	157	30	27	10	224	
5	1,265	40	5	215,056	39,391	18,556	8,856	279,859	40	135	26	10	16	187	
6	719	41	6	121,304	22,648	10,783	4,136	158,911	41	100	13	15	6	152	
7	436	42	7	73,743	13,785	8,408	2,362	86,368	42	100	13	15	2	130	
8	279	43	8	47,367	8,801	4,170	1,459	61,797	43	92	16	14	2	124	
9	191	44	9	32,302	5,844	2,983	1,047	42,178	44	61	16	10	5	92	
10	136	45	10	22,976	4,083	2,131	870	30,010	45	65	16	6	2	89	
11	106	46	11	18,344	3,007	1,556	815	23,522	46	57	17	8	1	83	
12	70	47	12	11,767	2,153	1,131	430	15,481	47	62	16	5	3	86	
13	48	48	13	7,833	1,603	801	327	10,564	48	42	13	12	1	68	
14	36	49	14	5,912	1,142	599	246	7,899	49	48	17	7	1	72	
15	27	50	15	4,420	877	481	188	5,966	50	54	11	2	1	86	
16	21	51	16	3,517	824	412	155	4,706	51	29	11	9	1	50	
17	17	52	17	2,799	547	326	150	3,822	52	47	6	5	2	40	
18	14	53	18	2,254	489	247	109	3,099	53	38	7	2	2	48	
19	12	54	19	1,953	384	232	101	2,660	54	24	5	2	2	31	
20	10	55	20	1,586	329	178	100	2,191	55	24	5	1	2	30	
21	9	56	21	1,429	305	159	90	1,983	56	32	5	2	2	41	
22	8	57	22	1,243	303	180	81	1,807	57	26	4	4	3	37	
23	6	58	23	1,187	304	143	72	1,706	58	24	5	2	2	33	
24	6	59	24	1,004	218	145	64	1,431	59	26	5	1	7	39	
25	6	60	25	892	235	113	53	1,295	60	19	3	2	1	25	
26	5	61	26	727	182	120	38	1,048	61	18	2	1	1	23	
27	4	62	27	611	142	99	42	894	62	20	3	1	1	24	
28	4	63	28	543	149	91	44	827	63	14	4	1	1	19	
29	3	64	29	422	136	70	32	660	64	6	2	2	1	9	
30	3	65	30	371	90	57	21	539	65	10	1	1	2	13	
31	2	66	31	286	80	53	33	452	66	7	4	3	1	14	
32	2	67	32	251	64	42	25	382	67	9	4	3	1	16	
33	1	68	33	222	52	41	11	326	68	11	4	2	1	11	
34	1	69	34	202	48	28	25	303	69	7	2	2	1	11	
35	1	70	35	168	46	31	11	258	70	1	1	2	1	4	
										33	39	10	18	2	69
										Ballon Oversized					
										Total	4,970,581	864,874	476,104	132,551	6,564,090

**Notes**  
 [1] RBMC volume data (July 2004-June 2005)  
 RDU volume data (January 2005-June 2005)  
 RDU weight distribution based on RBMC average weight distribution by weight steps

Source: PRS Experiment Data.

USPS-T-3 WP-PRS-4	
RBMC Forecast Volume Distribution	
	Forecast Volumes <sup>[1]</sup> [A]
[a] RBMC Zones 1&2	7,269,459
[b] Zone 3	1,440,381
[c] Zone 4	696,303
[d] Zone 5	193,856
[e] Total	9,600,000
<b>Notes</b>	
[1] Calculation: $[Aa] \text{ to } [Ad] = (\text{WP-PRS-1, Inputs } [4a] \text{ to } [4d]) * (\text{Input } [1] - \text{Input } [3])$ $[Ae] = \text{Sum of } [Aa] \text{ to } [Ad]$	

**Distribution of Forecast PRRS Pieces by Zone and Weight**

RDU (1)		RBMC(2)										RBMC Total	
Weight (Pounds)	Weight (Pounds)	Weight (Pounds)	Zone 1 & 2	Zone 3	Zone 4	Zone 5	Zone 6	Weight (Pounds)	Zone 1, 2, 3	Zone 4	Zone 5	Zone 6	RBMC Total
1	118	36	2,815,332	976,906	283,152	72,357	36	227	60	50	18	354	
2	109	37	2,089,369	384,821	164,969	48,841	37	180	42	26	16	328	
3	84	38	1,117,263	210,118	96,668	21,494	38	180	45	36	15	281	
4	109	39	592,425	109,845	59,431	16,070	39	230	44	38	15	328	
5	40	40	314,520	97,809	27,138	10,077	40	197	36	15	23	273	
6	74	41	177,495	33,123	15,741	6,048	41	151	41	22	8	222	
7	83	42	107,849	20,131	9,503	3,454	42	146	19	22	3	180	
8	60	43	66,274	12,871	6,547	2,134	43	135	23	20	3	161	
9	45	44	47,242	8,547	4,363	1,531	44	86	23	15	7	135	
10	43	45	33,602	5,871	3,117	1,199	45	83	25	12	1	121	
11	40	46	26,828	4,368	2,276	899	46	83	23	7	4	126	
12	47	47	17,708	3,148	1,854	628	47	81	18	18	1	99	
13	48	48	11,456	2,344	1,171	478	48	70	25	10	1	105	
14	49	49	8,648	1,870	978	360	49	79	18	5	1	90	
15	50	50	6,484	1,283	703	275	50	79	18	3	1	73	
16	51	51	5,144	913	603	227	51	42	16	13	1	73	
17	52	52	4,064	800	477	218	52	88	9	7	3	88	
18	53	53	3,296	715	361	159	53	58	10	3	3	72	
19	54	54	2,816	518	338	146	54	35	7	1	3	45	
20	55	55	2,320	461	233	166	55	45	7	1	3	57	
21	56	56	2,090	448	233	166	56	47	7	3	3	60	
22	57	57	1,818	445	209	118	57	38	6	6	4	54	
23	58	58	1,736	445	209	105	58	35	7	3	3	48	
24	59	59	1,468	318	212	84	59	38	7	1	10	57	
25	60	60	1,305	344	168	78	60	28	4	4	3	37	
26	61	61	1,083	237	176	61	61	28	3	1	1	34	
27	62	62	884	208	145	51	62	28	4	1	1	35	
28	63	63	784	218	133	64	63	20	6	1	1	28	
29	64	64	617	199	102	64	64	8	1	3	1	13	
30	65	65	543	132	83	31	65	15	1	3	1	18	
31	66	66	418	117	78	28	66	10	6	1	3	20	
32	67	67	367	84	61	37	67	13	6	4	1	23	
33	68	68	326	78	60	37	68	16	1	1	1	18	
34	69	69	295	70	41	37	69	10	3	3	1	16	
35	70	70	248	67	45	18	70	8	1	1	1	8	
	Balloon Overized							70				50	
	Total	3,200,000						7,268,438	1,440,381	898,303	183,856	9,800,000	
Total Nonmachable Pieces													834,040
Nonmachable Share of Pieces 1.25 pounds													9.576%

**Notes**

(1) RDU weight distribution based on RBMC average weight distribution by weight step

(2) Calculation:  
 Rows 1 Found through Overized = (Volume Distribution (WP-PRR-3), Total RBMC volume for each weight / total RBMC volume) \* Input (3)  
 Total Row: Sum of rows 1 Found to Overized for RDU

(3) Calculation:  
 (Current Volume (WP-PRR-3), (RBMC volume for each weight and zone / total RBMC volume by zone)) \* (RBMC Forecast (WP-PRR-4), (A) to (A-Z))  
 Total Row: Sum of rows 1 Found to Overized for each zone

RBMC Total Column: Sum of zones for each row.  
 Nonmachable Total = (RBMC Total) \* (WP-PRR-1, Input (2))  
 Nonmachable Share Under 25 lbs = (Nonmachable Total - Sum of RBMC volume 26 - 70 pounds) / (Sum of RBMC volume 1 - 30 pounds)

Calculation of RDU Cost Savings by Weight

USPS-1-3  
WP-PRS-3

Calculation of Savings<sup>(1)</sup>

Weight (Pounds)	Projected RDU-Volume-Weighted Intra-BMC Local Revenue [A]	Weight (Pounds)	Projected RDU-Volume-Weighted Intra-BMC Local Revenue [A]		Machinable Pieces [B]	Non-machinable Pieces [C]	Balloon-Rate Pieces [D]	All Regular-Size Pieces Combined [E]
1	3,504,391	36	796					
2	2,978,943	37	741					
3	1,756,365	38	640					
4	1,007,158	39	755	[a] Average Cubic Feet Per Piece	0.425	2.777	2.777	
5	574,377	40	635					
6	345,513	41	521	[b] Transportation Savings (\$ Per Cubic Foot)	2.442	2.442	2.442	
7	216,106	42	449					
8	141,593	43	432	[c] Transportation Savings (\$ Per Wt. Avg. Piece)	1.038	6.781	6.781	1.357
9	98,898	44	323					
10	71,833	45	315	[d] Non Transportation Savings (\$ Per Piece)	1.233	4.800	4.800	1.420
11	57,335	46	295					
12	38,490	47	309	[e] RDU Projected Regular-Size Volumes	3,021,839	178,010	17	3,199,966
13	26,728	48	246					
14	20,294	49	261	[f] Total RDU-Volume-Weighted Revenue Using Benchmark (Intra-BMC Local) Rates:				
15	15,560	50	249					10,948,820
16	12,509	51	185					
17	10,266	52	222	[g] Weighted Average Benchmark Revenue Per Piece				3.422
18	8,445	53	183					
19	7,382	54	117	[h] Weighted Average Savings Per Piece				2.778
20	6,142	55	148					
21	5,617	56	156	[i] Proposed Price				2.11
22	5,171	57	142					
23	4,940	58	127					
24	4,193	59	151					
25	3,838	60	97					
26	3,132	61	90					
27	2,702	62	95					
28	2,524	63	75					
29	2,037	64	36					
30	1,684	65	52					
31	1,423	66	56					
32	1,212	67	65					
33	1,047	68	45					
34	981	69	45					
35	835	70	16					
		Balloon	69					

Notes

- [1] Calculation Column [A], rows 1 Pound to 70 Pounds = (Proposed Parcel Post Rates (WP-PRS-2), Intra-BMC Local Rate by weight) \* (Current Volumes (WP-PRS-4), RDU pieces by weight)  
 Calculation Column [A], Balloon row = (Proposed Parcel Post Rates (WP-PRS-3), Intra-BMC Local 15-pound Rate) \* (Current Volumes (WP-PRS-4), RDU Balloon pieces)  
 Source [Ba] (WP-PRS-1, Input [14])  
 [Ca], [Da] (WP-PRS-1, Input [15])  
 [Bb] to [Db] (WP-PRS-1, Input [3])  
 Calculation Row [c], Columns [B] to [D] = Row [a] \* Row [b], Columns [B] to [D]  
 [Ec] = [Bc]\*[Be] + [Cc]\*[Ca] + [Dc]\*[De] / [Ea]  
 Source [Bd] (WP-PRS-1, Input [7])  
 [Cd], [Dd] (WP-PRS-1, Input [8])  
 Calculation [Ed] = [Bd]\*[Be] + [Cd]\*[Ca] + [Dd]\*[De] / [Ea]  
 Calculation [Be] = (WP-PRS-1, Input [3]) \* (1 - (Current Volumes (WP-PRS-3), Sum of RDU Balloon and Oversize volumes) / (Current Volumes (WP-PRS-3), Total RDU volume)) \* (1 - WP-PRS-1, Input [2])  
 [Ce] = [Be] / (1 - (WP-PRS-1, Input [2])) \* (WP-PRS-1, Input [2])  
 [De] = (WP-PRS-1, Input [3]) \* (Current Volumes (WP-PRS-3), RDU Balloon volume) / (Current Volumes (WP-PRS-3), Total RDU volume)  
 [Ee] = Sum of [Be], [Ce], [De]  
 Calculation [Ef] = (Sum of Column [A], Rows 1 pound to Balloon)  
 Calculation [Eg] = [Ef] / (Current Volumes (WP-PRS-3), Sum of RDU volumes for 1 pound to Balloon)  
 Calculation [Eh] = [Ec] + [Ed]  
 Calculation [Ei] Input [17], Current PRS Rate for RDU (\$2.00)

USPS-13 WP-PRS-7										
Distribution of RBMC Cost Savings by Weight										
		Machinable Return BMC All Zones [A]	Nonmachinable Return BMC All Zones [B]							
<b>Savings<sup>[1]</sup></b>										
[a]	Non-Transportation (Per Piece)	0.4820	1.0020							
[b]	Transportation (Per Cubic Foot)	2.2120	2.2120							
[c]	Cubic Feet Per Piece	0.4250	2.7770							
<b>Calculation of Savings<sup>[2]</sup></b>										
	Weight (Pounds)	Machinable Return BMC All Zones [A]	Nonmachinable Return BMC All Zones [B]	Weight (Pounds)	Nonmachinable Return BMC All Zones [B]		Pieces Weighing 1 to 35 Pounds [C]	Pieces Weighing Over 35 Pounds [D]	Balloon-Rate Pieces [E]	
	1	4,771,833	1,402,255	36	2,529					
	2	3,638,418	1,069,189	37	2,341					
	3	1,950,170	573,079	38	2,006	[d]	Calculated Savings	18,881,086	26,969	355
	4	1,032,925	303,536	39	2,341					
	5	549,894	161,592	40	1,954	[e]	Total Pieces	9,596,075	3,775	50
	6	312,244	91,756	41	1,588					
	7	189,353	55,644	42	1,358	[f]	Average Savings/Piece	1.738	7.145	7.146
	8	121,425	35,882	43	1,296					
	9	82,872	24,353	44	961					
	10	58,967	17,328	45	930					
	11	46,218	13,582	46	867					
	12	30,418	8,939	47	899					
	13	20,757	6,100	48	711					
	14	15,521	4,561	49	752					
	15	11,723	3,445	50	711					
	16	9,251	2,718	51	522					
	17	7,510	2,207	52	627					
	18	6,089	1,789	53	512					
	19	5,266	1,547	54	324					
	20	4,305	1,265	55	408					
	21	3,896	1,145	56	428					
	22	3,551	1,043	57	387					
	23	3,352	985	58	345					
	24	2,812	826	59	408					
	25	2,545	748	60	261					
	26	2,059	605	61	240					
	27	1,757	516	62	251					
	28	1,625	478	63	199					
	29	1,297	381	64	94					
	30	1,059	311	65	136					
	31	868	261	66	146					
	32	751	221	67	167					
	33	641	188	68	115					
	34	595	175	69	115					
	35	503	148	70	42					
				Balloon	355					
<b>Notes</b>										
[1]	Source: [Aa] WP-PRS-1, -input [10] [Ba] WP-PRS-1, -input [11] [Ab],[Bb] WP-PRS-1, -input [6] [Ac] WP-PRS-1, input [14] [Bc] WP-PRS-1, input [15]									
[2]	Calculation: Column [A] pounds 1 to 35 = ([Aa] + [Ab]/[Ac]) * (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 1-35) * (1 - (RBMC Volume Distribution (WP-PRS-6), RBMC Nonmachinable share under 36 pounds)) Column [B] pounds 1 to 35 = ([Ba] + [Bb]/[Bc]) * (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 1-35) * (RBMC Volume Distribution (WP-PRS-6), RBMC Nonmachinable share under 36 pounds) Column [B], pounds 36 to 70, plus Balloon = ([Ba] + [Bb]/[Bc]) * (RBMC Volume Distribution (WP-PRS-6), RBMC Totals, pounds 36 to 70, plus Balloon)									
	Calculation: [Cd] = (Sum of Columns [A] and [B] pounds 1-35) [Ce] = (Sum of RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, pounds 1-35) [Cf] = [Cd] / [Ce] Source: [Cg], [Ch] (Assumed)									
	Calculation: [Dd] = (Sum of Column [B], pounds 36-70) [De] = (Sum of RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, pounds 36-70) [Df] = [Dd] / [De] Source: [Dg], [Dh] (Assumed)									
	Calculation: [Ed] = (Column [B], Balloon row) [Ea] = (RBMC Volume Distribution (WP-PRS-6), RBMC Totals Column, Balloon row) [Ef] = [Ed] / [Ea]									

USPS-1-3 WP-PRS-8	
<b>Oversized Mail Savings Calculation</b>	
	<b>Unit Cost Savings<sup>[1]</sup> [A]</b>
	<b>RDU Savings</b>
<b>[a]</b>	Non-Transportation (Per Piece) \$ 11.126
<b>[b]</b>	Transportation (Per Piece) \$ 19.385
<b>[c]</b>	Total \$ 30.51
	<b>RBMC Savings</b>
<b>[d]</b>	Non-Transportation (Per Piece) \$ 1.536
<b>[e]</b>	Transportation (Per Piece) \$ 17.559
<b>[f]</b>	Total \$ 19.09
<b>Notes</b>	
<p>[1] Source: [Aa]: (WP-PRS-1, Input [9])            Calculation: [Ab] = (WP-PRS-1, Input [5] * Input [16])            Calculation: [Ac] = ([Aa] + [Ab])            Source: [Ad]: (WP-PRS-1, Input [12])            Calculation: [Ae] = (WP-PRS-1, Input [6] * Input [16])            Calculation: [Af] = ([Ad] + [Ae])</p>	



USPS <sup>®</sup> T-3 WP-PRB-10															
Proposed Parcel Select Return Service Rates (1)															
RDU						RBMC									
Weight (Pounds)	RDU (A)	Weight (Pounds)	RDU (A)	Weight (Pounds)	RDU (A)	Weight (Pounds)	RBMC Zones 1 & 2 (B)	RBMC Zone 3 (C)	RBMC Zone 4 (D)	RBMC Zone 5 (E)	Weight (Pounds)	RBMC Zones 1 & 2 (B)	RBMC Zone 3 (C)	RBMC Zone 4 (D)	RBMC Zone 5 (E)
1	2.11	36	2.11	2.11	2.11	1	2.21	2.25	2.31	2.40	36	9.11	11.05	11.74	12.66
2	2.11	37	2.11	2.11	2.11	2	2.81	2.85	2.92	3.04	37	9.19	11.13	11.80	12.71
3	2.11	38	2.11	2.11	2.11	3	3.39	3.43	3.52	3.65	38	9.23	11.20	11.88	12.78
4	2.11	39	2.11	2.11	2.11	4	3.80	3.96	4.07	4.22	39	9.29	11.29	11.90	12.81
5	2.11	40	2.11	2.11	2.11	5	3.78	4.38	4.52	4.73	40	9.33	11.34	11.94	12.87
6	2.11	41	2.11	2.11	2.11	6	3.95	4.76	4.90	5.21	41	9.40	11.43	11.98	12.92
7	2.11	42	2.11	2.11	2.11	7	4.11	5.09	5.25	5.64	42	9.43	11.49	12.03	12.96
8	2.11	43	2.11	2.11	2.11	8	4.71	5.40	5.57	6.05	43	9.47	11.61	12.12	13.02
9	2.11	44	2.11	2.11	2.11	9	4.95	5.89	5.99	6.42	44	9.53	11.66	12.27	13.06
10	2.11	45	2.11	2.11	2.11	10	5.03	5.98	6.20	6.71	45	9.66	11.66	12.30	13.09
11	2.11	46	2.11	2.11	2.11	11	5.16	6.20	6.47	7.08	46	9.83	11.74	12.33	13.12
12	2.11	47	2.11	2.11	2.11	12	5.32	6.41	6.75	7.39	47	9.88	11.78	12.38	13.15
13	2.11	48	2.11	2.11	2.11	13	5.46	6.56	7.00	7.66	48	9.71	11.86	12.38	13.18
14	2.11	49	2.11	2.11	2.11	14	5.58	6.70	7.26	7.93	49	9.77	11.91	12.38	13.21
15	2.11	50	2.11	2.11	2.11	15	5.70	6.88	7.48	8.16	50	9.78	11.96	12.40	13.21
16	2.11	51	2.11	2.11	2.11	16	5.82	7.06	7.69	8.41	51	9.88	12.00	12.43	13.26
17	2.11	52	2.11	2.11	2.11	17	5.96	7.23	7.93	8.63	52	9.88	12.09	12.46	13.28
18	2.11	53	2.11	2.11	2.11	18	6.05	7.39	8.13	8.83	53	9.90	12.12	12.47	13.31
19	2.11	54	2.11	2.11	2.11	19	6.18	7.55	8.32	9.03	54	9.96	12.14	12.50	13.34
20	2.11	55	2.11	2.11	2.11	20	6.28	7.69	8.48	9.21	55	9.99	12.16	12.53	13.37
21	2.11	56	2.11	2.11	2.11	21	6.38	7.84	8.64	9.39	56	10.03	12.18	12.66	13.40
22	2.11	57	2.11	2.11	2.11	22	6.49	7.97	8.79	9.55	57	10.09	12.19	12.68	13.44
23	2.11	58	2.11	2.11	2.11	23	6.58	8.14	8.94	9.71	58	10.12	12.20	12.67	13.47
24	2.11	59	2.11	2.11	2.11	24	6.67	8.26	9.08	9.87	59	10.18	12.21	12.69	13.50
25	2.11	60	2.11	2.11	2.11	25	6.76	8.39	9.19	10.00	60	10.20	12.22	12.69	13.53
26	2.11	61	2.11	2.11	2.11	26	6.86	8.51	9.33	10.14	61	10.24	12.23	12.61	13.56
27	2.11	62	2.11	2.11	2.11	27	6.95	8.64	9.44	10.27	62	10.27	12.24	12.66	13.59
28	2.11	63	2.11	2.11	2.11	28	7.02	8.77	9.54	10.39	63	10.31	12.24	12.74	13.63
29	2.11	64	2.11	2.11	2.11	29	7.11	8.90	9.65	10.51	64	10.38	12.24	12.74	13.66
30	2.11	65	2.11	2.11	2.11	30	7.20	9.00	9.76	10.61	65	10.38	12.27	12.78	13.69
31	2.11	66	2.11	2.11	2.11	31	7.26	9.09	9.85	10.73	66	10.43	12.27	12.83	13.72
32	2.11	67	2.11	2.11	2.11	32	7.36	9.21	9.96	10.82	67	10.47	12.28	12.89	13.76
33	2.11	68	2.11	2.11	2.11	33	7.44	9.32	10.04	10.93	68	10.47	12.28	12.91	13.78
34	2.11	69	2.11	2.11	2.11	34	7.53	9.40	10.13	11.01	69	10.63	12.28	12.96	13.82
35	2.11	70	2.11	2.11	2.11	35	7.59	9.52	10.21	11.11	70	10.86	12.28	13.00	13.88
		Balloon <sup>TM</sup> Oversized									Balloon <sup>TM</sup> Oversized	27.39	27.73	28.46	29.56

Surcharge (Per Piece)<sup>TM</sup>  
 Nonmachinable Surcharge (Nonmachinable pieces weighing less than 36 pounds)  
 RBMC Pieces 1.42

Notes

(1) Source: Docket No. R2005-1, USPS T-28A, Table 6

USPS 73 WFA-RS-10 Proposed Parcel Select Return Service Rates (1)													
RDU				RBMC									
Weight (Pounds)	RDU [A]	Weight (Pounds)	RDU [A]	Weight (Pounds)	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 8 [E]	Weight (Pounds)	RBMC Zones 1 & 2 [B]	RBMC Zone 3 [C]	RBMC Zone 4 [D]	RBMC Zone 8 [E]

Projected Revenue												
Summary of Projected Revenue												
(A) 6,752,195 PSRS RDU (B) 28,418,964 PSRS RBMC (C) 58,171,180 TOTAL												
PSRS Projected Revenue Detail <sup>(1)</sup>												
Weight (Pounds)	RDU (A)	RBMC Zones 1 & 2 (B)	RBMC Zone 3 (C)	RBMC Zone 4 (D)	RBMC Zone 6 (E)	Weight (Pounds)	RDU (A)	RBMC Zones 1 & 2 (B)	RBMC Zone 3 (C)	RBMC Zone 4 (D)	RBMC Zone 6 (E)	
1	2,496,003	5,779,884	1,268,038	663,322	173,656	36	248	2,005	683	217	222	
2	1,804,718	5,871,211	1,096,740	540,108	148,781	37	230	2,218	472	177	223	
3	1,020,817	3,787,521	720,700	340,263	100,352	38	198	1,860	508	451	224	
4	540,738	2,132,726	433,383	205,256	67,605	39	230	2,133	495	470	187	
5	287,871	1,188,686	252,329	122,965	47,427	40	182	1,842	431	175	301	
6	183,460	701,108	157,664	77,151	31,515	41	156	1,418	468	283	113	
7	99,127	443,261	102,468	48,893	18,483	42	134	1,379	218	264	36	
8	63,566	326,282	69,508	33,969	12,909	43	128	1,274	270	247	38	
9	43,383	229,123	46,290	25,896	9,631	44	95	850	272	177	95	
10	30,868	168,020	35,708	19,323	8,119	45	92	909	273	108	38	
11	24,185	138,433	27,206	14,723	6,388	46	85	803	282	144	19	
12	15,924	81,553	20,184	11,165	4,647	47	88	878	276	90	58	
13	10,866	62,548	15,426	8,200	3,963	48	70	586	225	127	19	
14	8,125	48,333	11,190	6,360	2,853	49	74	686	286	217	19	
15	6,137	39,846	8,624	5,262	2,246	50	70	772	182	36	19	
16	4,643	28,836	6,443	4,834	1,908	51	51	418	193	104	18	
17	3,931	24,388	5,784	3,781	1,883	52	62	680	108	91	39	
18	3,188	18,944	5,285	2,937	1,408	53	50	550	124	36	38	
19	2,757	17,652	4,351	2,823	1,334	54	32	348	88	37	30	
20	2,254	14,367	3,700	2,183	1,347	55	40	453	88	18	30	
21	2,040	13,334	3,487	2,009	1,236	56	42	488	89	37	39	
22	1,856	11,798	3,532	2,314	1,131	57	38	383	71	73	59	
23	1,755	11,423	3,619	1,870	1,022	58	34	355	86	37	38	
24	1,472	8,784	2,634	1,821	924	59	40	386	66	18	138	
25	1,332	8,810	2,884	1,540	775	60	26	283	54	37	20	
26	1,078	7,284	2,016	1,637	578	61	24	285	36	18	20	
27	920	6,210	1,784	1,367	631	62	25	300	54	19	20	
28	851	5,575	1,811	1,270	669	63	20	211	72	18	20	
29	679	4,368	1,170	886	492	64	8	91	37	37	20	
30	554	3,907	1,185	814	326	65	13	152	72	18	40	
31	485	3,043	1,094	764	516	66	14	107	72	18	40	
32	383	2,709	802	612	386	67	11	138	72	37	40	
33	335	2,418	708	802	176	68	11	168	36	38	38	
34	312	2,225	660	415	403	69	11	108	16	16	38	
35	263	1,865	640	483	179	70	4	15	4	11	38	
						Ballon Oversized	208	275	406	749	86	
Total							6,752,195	21,235,255	4,361,176	2,183,516	659,037	

Notes:  
 Calculations for Projected Revenue  
 (1) Calculation: (A) to (E) Proposed PSRS Rates (MP-PRR-10); \* Volume Distribution (MP-PRR-5)

USPS-7-51  
WP-PRS-12

## Revenue Impacts

[a]  
[b]

**Summary of Revenue Impacts<sup>[1]</sup>**

	[A]
PSRS RDU	(4,197,457)
PSRS RBMC	(8,719,734)

**Return BMC Revenue Impact Detail<sup>[2]</sup>**

	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]	Weight (Pounds)	RBMC Zones 1 & 2 [A]	RBMC Zone 3 [B]	RBMC Zone 4 [C]	RBMC Zone 5 [D]
1		(2,378,952)	(519,218)	(258,437)	(65,845)	36	(199)	(53)	(43)	(15)
2		(1,901,353)	(346,339)	(168,321)	(44,047)	37	(215)	(38)	(24)	(16)
3		(1,016,709)	(189,107)	(87,966)	(24,744)	38	(165)	(42)	(35)	(16)
4		(539,107)	(100,050)	(45,388)	(14,418)	39	(216)	(41)	(37)	(14)
5		(286,213)	(52,425)	(24,596)	(9,124)	40	(188)	(37)	(14)	(22)
6		(161,521)	(30,142)	(14,324)	(5,444)	41	(148)	(40)	(21)	(9)
7		(98,143)	(18,320)	(8,648)	(3,144)	42	(146)	(19)	(22)	(3)
8		(63,040)	(11,584)	(5,489)	(1,942)	43	(137)	(24)	(21)	(3)
9		(42,518)	(7,778)	(3,970)	(1,393)	44	(93)	(25)	(15)	(8)
10		(30,242)	(5,374)	(2,805)	(1,079)	45	(101)	(25)	(9)	(3)
11		(24,414)	(3,958)	(2,071)	(818)	46	(91)	(27)	(13)	(2)
12		(15,660)	(2,834)	(1,489)	(566)	47	(101)	(26)	(8)	(5)
13		(10,425)	(2,110)	(1,066)	(435)	48	(69)	(21)	(20)	(2)
14		(7,782)	(1,520)	(797)	(324)	49	(81)	(29)	(12)	-
15		(5,882)	(1,167)	(640)	(250)	50	(92)	(19)	(3)	(2)
16		(4,629)	(830)	(548)	(206)	51	(50)	(19)	(18)	(2)
17		(3,684)	(728)	(429)	(200)	52	(84)	(11)	(9)	(4)
18		(3,000)	(644)	(325)	(145)	53	(69)	(13)	(4)	(4)
19		(2,571)	(519)	(305)	(134)	54	(44)	(9)	(4)	-
20		(2,111)	(438)	(234)	(133)	55	(56)	(9)	(2)	(4)
21		(1,881)	(406)	(212)	(120)	56	(61)	(10)	(4)	(4)
22		(1,654)	(399)	(240)	(108)	57	(50)	(8)	(8)	(9)
23		(1,562)	(400)	(188)	(95)	58	(47)	(10)	(4)	(4)
24		(1,336)	(290)	(193)	(84)	59	(52)	(10)	(2)	(14)
25		(1,174)	(313)	(153)	(71)	60	(38)	(6)	(4)	(2)
26		(968)	(213)	(158)	(52)	61	(39)	(4)	(2)	(2)
27		(804)	(189)	(132)	(55)	62	(42)	(6)	(2)	-
28		(723)	(198)	(121)	(59)	63	(29)	(8)	(2)	-
29		(562)	(179)	(93)	(42)	64	(13)	-	(4)	(2)
30		(494)	(120)	(76)	(28)	65	(22)	-	(2)	(4)
31		(381)	(105)	(71)	(44)	66	(15)	(9)	(2)	(4)
32		(330)	(85)	(56)	(33)	67	(20)	(9)	(7)	-
33		(295)	(68)	(55)	(15)	68	(25)	-	-	-
34		(266)	(64)	(37)	(33)	69	(18)	(5)	(5)	-
35		(224)	(61)	(41)	(15)	70	(2)	(2)	(5)	-
						Balloon	(44)	-	(1)	-
						Oversized	(510)	(131)	(235)	(28)

**Notes**

[1] Calculation [Aa] = (RDU Savings Calculation (WP-PRS-6), [Ea]) \*  
 (Proposed PRS Rates (WP-PRS-10), 1-pound rate -  
 RDU Savings Calculation (WP-PRS-6), [Eg]) +  
 (WP-PRS-1, Input [3]) - (RDU Savings Calculation (WP-PRS-7), [Ea]) \*  
 (Proposed PRS Rates (WP-PRS-10), RDU Oversize Rate -  
 Proposed Parcel Post Rates (WP-PRS-2), Intra-BMC Local Oversize Rate)  
 [Ab] = Sum of Columns [A] to [D], 1-pound row to Oversize row

[2] Calculation  
 Columns [A] to [D], 1-pound to 35 pounds, and Oversize row =  
 (Proposed PRS Rates (WP-PRS-10), Columns [B] to [E]) -  
 Proposed Parcel Post Rates (WP-PRS-2), Intra-BMC Zoned Rates \*  
 (Volume Distribution (WP-PRS-5), Return BMC Pieces, Zones 1 to 5)  
 Columns [A] to [D], 36-pounds to 70 pounds =  
 (Parcel Select Return Rates (WP-PRS-10), Columns [B] to [E]) -  
 Proposed Parcel Post Rates (WP-PRS-2), (Intra-BMC Zoned Rates +  
 Intra-BMC Nonmachinable Surcharge)) \*  
 (Volume Distribution (WP-PRS-6), Return BMC Pieces, Zones 1 to 5)  
 Columns [A] to [D], Balloon row =  
 (Proposed PRS Rates (WP-PRS-10), Cols [B] to [E], Balloon row -  
 Proposed Parcel Post Rates (WP-PRS-2), Intra-BMC Zoned 15-Pound Rates \*  
 (Volume Distribution (WP-PRS-5), RBMC Balloon Pcs, Zones 1 to 5)

USPS-T-3 WP-PRS-13						
Financial Summary						
		Volume <sup>[1]</sup> [A]	Projected Revenue <sup>[2]</sup> [B]	Cost Savings <sup>[3]</sup> [C]	Revenue Reduction <sup>[4]</sup> [D]	Savings Passthrough <sup>[5]</sup> [E]
[a]	Parcel Select RDU	3,200,000	\$6,752,195	\$8,889,600	\$4,197,467	47.2%
[b]	RBMC	9,600,000	\$28,418,984	\$16,982,312	\$8,719,734	51.3%
<b>Notes</b>						
<p>[1] Source: [Aa]: (WP-PRS-1, Input [3]) [Ab]: RBMC Forecast (WP-PRS-5), [Ae]</p> <p>[2] Calculation: [Ba] = (Projected Revenue Calculation (WP-PRS-11), [Aa]) [Bb] = (Projected Revenue Calculation (WP-PRS-11), [Bb])</p> <p>[3] Calculation: [Ca] = (RDU Savings Calculation (WP-PRS-7), [Ea]) * (RDU Savings Calculation (WP-PRS-6), [Ec] + [Ed]) * (WP-PRS-1, Input [3]) - (RDU Savings Calculation (WP-PRS-6), [Ee]) * (Oversized Cost Savings (WP-PRS-8), [Aa] * [Ab])</p> <p>Calculation: [Cb] = (RBMC Savings Calculation (WP-PRS-7), [Cd] + [Dd] * [Ed]) + (RBMC Savings Calculation (WP-PRS-7), [Ce]) * (WP-PRS-1, Input [13]) * (1 - Volume Distribution RBMC (WP-PRS-6), RBMC Nonmachinables share &lt; 35 pounds) + (Oversized Cost Savings (WP-PRS-8), [Ae] * [Af]) * (Volume Distribution RBMC (WP-PRS-6), RBMC Total column, Oversized row)</p> <p>[4] Source: [Da] to [Db]: Revenue Impacts (WP-PRS-12), [Aa] to [Ab]</p> <p>[5] Calculation: [E] = [D] / [C]</p>						

**POSTAL RATE COMMISSION  
DOCKET NO. MC2006-1  
PARCEL RETURN SERVICE**

I, Samuel J. Koroma, hereby declare under penalty of perjury that:

The *Direct Testimony of Samuel J. Koroma on Behalf of the United States Postal Service*, denominated USPS-T-3, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

  
\_\_\_\_\_  
Samuel J. Koroma

1-5-06  
Date

**United States Postal Service**

**Michael W. Miller  
(USPS-T-2)**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

The referenced table is the guide that should be followed when PRS sampling activities are performed. It is my understanding that no study has been conducted to verify field compliance. When the term "were counted" is used in these interrogatories, it is assumed that the term "should be sampled" is what the author actually meant.

(a) Confirmed.

(b) Confirmed.

(c) Confirmed.

(d) Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

The productivities in question are "marginal" productivities that have been adjusted to reflect the Postal Service volume variability cost methodology (i.e., the actual productivity values are divided by volume variability factors). If you look at the formula in the cells, the base productivity figures filed in the instant proceeding are identical to those relied upon in Docket No. MC2003-2. The reason the marginal productivity values differ is the fact that different volume variability factors were used. Witness Eggleston relied on Docket No. R2001-1 volume variability factors. In the instant proceeding, I have relied on Docket No. R2005-1 volume variability factors.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

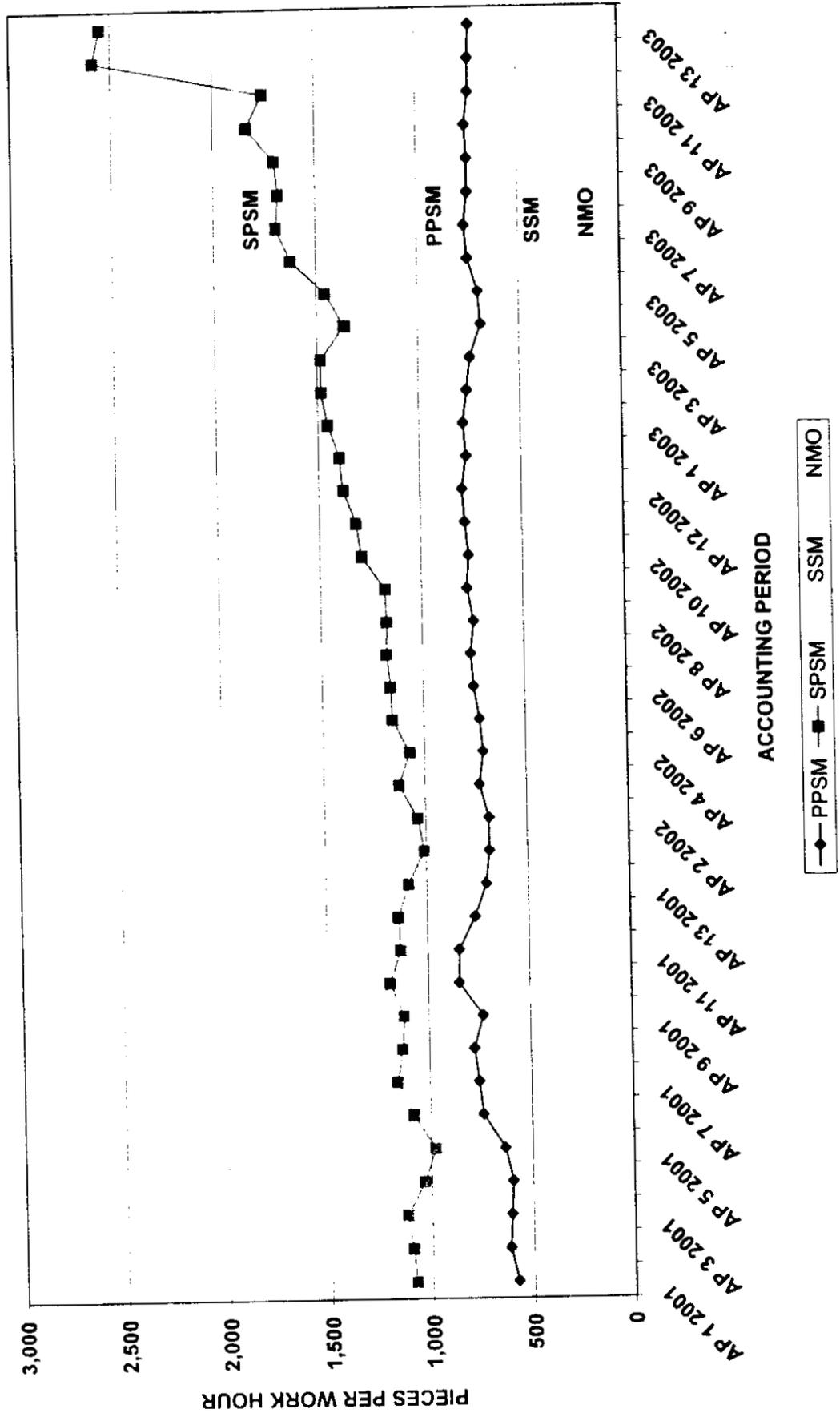
(a) Please see Attachment 1.

(b) Please see Attachment 1 and the response to Docket No. R2005-1, POIR No. 4, Question 5.

**FY 2003 PIMS DATA**

<u>Description</u>	<u>Op. No.</u>	<u>Value</u>
PPSM Total Volume	120	1,079,067,306
Workhours	120	1,448,700
Productivity	120	744.852
SPSM Total Volume	130	931,329,398
Workhours	130	559,583
Productivity	130	1,664.328
SSM Total Volume	140	376,627,015
Workhours	140	1,081,212
Productivity	140	348.338
NMO Total Volume	201 / 202	121,663,627
Workhours	201 / 202	1,772,233
Productivity	201 / 202	68.650

**PIMS PRODUCTIVITIES FOR PPSM, SPSM, SSM, NMO OPERATIONS  
 AP 1 FY 2001 - AP 13 FY 2003**



<b>AP / FY</b>	<b>PPSM</b>	<b>SPSM</b>	<b>SSM</b>	<b>NMO</b>
AP 1 2001	577	1,081	349	79
AP 2 2001	615	1,097	350	77
AP 3 2001	606	1,121	350	71
AP 4 2001	598	1,034	315	88
AP 5 2001	635	977	357	80
AP 6 2001	741	1,084	359	73
AP 7 2001	759	1,162	371	80
AP 8 2001	780	1,134	373	75
AP 9 2001	734	1,125	386	80
AP 10 2001	849	1,193	386	77
AP 11 2001	846	1,138	385	75
AP 12 2001	764	1,145	368	80
AP 13 2001	707	1,091	363	73
AP 1 2002	689	1,010	359	66
AP 2 2002	689	1,040	353	65
AP 3 2002	734	1,131	354	72
AP 4 2002	712	1,073	329	82
AP 5 2002	727	1,158	365	78
AP 6 2002	753	1,163	364	72
AP 7 2002	765	1,180	371	72
AP 8 2002	749	1,177	374	69
AP 9 2002	778	1,182	369	67
AP 10 2002	768	1,296	363	68
AP 11 2002	784	1,321	364	67
AP 12 2002	795	1,382	359	68
AP 13 2002	772	1,397	362	66
AP 1 2003	784	1,452	358	68
AP 2 2003	765	1,483	353	66
AP 3 2003	747	1,484	355	62
AP 4 2003	691	1,365	328	66
AP 5 2003	703	1,456	357	67
AP 6 2003	754	1,622	372	69
AP 7 2003	769	1,695	377	71
AP 8 2003	752	1,682	372	72
AP 9 2003	752	1,700	380	72
AP 10 2003	761	1,836	373	71
AP 11 2003	744	1,756	362	70
AP 12 2003	743	2,590	283	70
AP 13 2003	735	2,553	285	73

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
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**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.

**RESPONSE:**

The use of the word "adjustments" may have caused confusion. The methodology used in the instant proceeding is identical to that relied upon by witness Eggleston in Docket No. MC2003-2, with the exceptions that I describe on pages 2 and 3 of my testimony. Witness Eggleston, however, relied on data from Docket No. R2001-1. I rely on base year 2004 data from Docket No. R2005-1 to complete my analysis. Therefore, the data contained in column G in Attachment B pages 2 and 3 of my cost study differ from those relied upon by witness Eggleston in Docket No. MC2003-2.

**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 variabilities 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 variabilities 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.

**RESPONSE:**

(a)-(b) The Postal Service is developing a PRS cost model that relies on the data contained in Docket No. R2005-1, PRC-LR-9. The cost model will be filed once it is completed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

In looking at both my records and the file that is posted on the Commission website, footnote "21/" in Attachment C, page 4 does appear to have a citation which indicates that the source of the data were the "August 2005 BMC PRS Survey."

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**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.

**RESPONSE:**

(a) The formula relied upon by witness Eggleston is identical to that used in the instant proceeding. The calculation relies on volume data in the table above the formulas on the same page. Given that the volumes witness Eggleston relied upon were FY 2000 volumes and the volumes I have relied upon are FY 2004 volumes, the results differ.

(b) The formula was based on FY 2000 ODIS data. The data were used to estimate the percentage of Inter-BMC that was entered via retail channels. The results of that analysis showed that 5.4 percent of the total Parcel Post mail volume consisted of Inter-BMC "retail" pieces. In the analysis, the term "retail" was defined as single-piece Parcel Post mail pieces bearing stamps or PVI indicia. The formula is shown below:

$$0.054 \cdot (\text{BY Total Parcel Post volume}) / (\text{BY Inter-BMC Parcel Post volume})$$

Given that Inter-BMC is not a part of the PRS analysis, it should be noted that this figure has no bearing on the PRS cost study results.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**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.

**RESPONSE:**

(a) The formula relied upon by witness Eggleston is identical to that used in the instant proceeding. The calculation relies on volume data in the table above the formulas on the same page. Given that the volumes witness Eggleston relied upon were FY 2000 volumes and the volumes I have relied upon are FY 2004 volumes, the results differ.

(b) The formula was based on FY 2000 ODIS data. The data were used to estimate the percentage of Intra-BMC that was entered via retail channels. The results of that analysis showed that 3.2 percent of the total Parcel Post mail volume consisted of Intra-BMC "retail" pieces. In the analysis, the term "retail" was defined as single-piece Parcel Post mail pieces bearing stamps or PVI indicia. The formula is shown below:

$$0.032 * (\text{BY Total Parcel Post volume}) / (\text{BY Intra-BMC Parcel Post volume})$$

**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.

**RESPONSE:**

(a) (b) (c) Please see Attachment 2.

### PRS AVERAGE STORAGE DAYS

<b>BMC No.</b>	<b>Total PRS Volume</b>	<b>Storage Days</b>
1	436,510	1.500
2	365,712	2.000
3	377,127	1.200
4	222,237	2.000
5	357,789	2.000
6	610,645	2.000
7	276,390	2.000
8	139,422	2.000
9	291,106	2.000
10	656,530	1.200
11	650,827	1.200
12	387,184	2.000
13	308,213	2.000
14	426,109	3.000
15	371,846	2.000
16	462,792	2.000
17	353,486	2.000
18	480,933	2.000
19	767,748	2.000
20	158,861	2.000
21	321,300	1.200
	8,422,767	1.834



**PRS MAIL VOLUME (JULY 2004 - JUNE 2005)**

<u>No.</u>	<u>Total PRS Volume</u>
1	436,510
2	365,712
3	377,127
4	222,237
5	357,789
6	610,645
7	276,390
8	139,422
9	291,106
10	656,530
11	650,827
12	387,184
13	308,213
14	426,109
15	371,846
16	462,792
17	353,486
18	480,933
19	767,748
20	158,861
21	321,300
	8,422,767

**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.

**RESPONSE:**

(a) (b) (c) Please see Attachment 2.

## PRS COVERAGE FACTORS

<b>BMC</b>	<b>Total</b>	<b>PPSM</b>	<b>SPSM</b>
<b><u>No.</u></b>	<b><u>PRS Volume</u></b>	<b><u>Coverage</u></b>	<b><u>Coverage</u></b>
1	436,510	436,510	0
2	365,712	365,712	365,712
3	377,127	377,127	0
4	222,237	0	222,237
5	357,789	357,789	0
6	610,645	610,645	0
7	276,390	276,390	0
8	139,422	139,422	0
9	291,106	291,106	0
10	656,530	656,530	0
11	650,827	650,827	650,827
12	387,184	387,184	0
13	308,213	308,213	0
14	426,109	426,109	0
15	371,846	371,846	371,846
16	462,792	462,792	0
17	353,486	353,486	0
18	480,933	480,933	0
19	767,748	767,748	0
20	158,861	158,861	158,861
21	321,300	321,300	321,300
	8,422,767	8,200,530	2,090,783
		97.36%	24.82%

### PRS AVERAGE STORAGE DAYS

<b>BMC No.</b>	<b>Total PRS Volume</b>	<b>Storage Days</b>
1	436,510	1.500
2	365,712	2.000
3	377,127	1.200
4	222,237	2.000
5	357,789	2.000
6	610,645	2.000
7	276,390	2.000
8	139,422	2.000
9	291,106	2.000
10	656,530	1.200
11	650,827	1.200
12	387,184	2.000
13	308,213	2.000
14	426,109	3.000
15	371,846	2.000
16	462,792	2.000
17	353,486	2.000
18	480,933	2.000
19	767,748	2.000
20	158,861	2.000
21	321,300	1.200
	8,422,767	1.834

**PRS SURVEY RESULTS**

No.	Participant 1 Machinable Processing	Participant 2 Machinable Processing	Participant 1 Machinable Container	Participant 2 Machinable Container	Participant 1 NMO / Over Processing	Participant 2 NMO / Over Processing	Participant 1 NMO / Over Container	Participant 2 NMO / Over Container	Participant 1 Storage Location	Participant 2 Storage Location	Participant 1 Pick Up Days	Participant 2 Pick Up Days
1	PPSM - Ded	PPSM - Ded	Pallet Box	Pallet Box	Manual	Manual	Pallet Box	Pallet Box	Floor	Floor	Tu, W, Th, F, Sa	Tu, W, Th, F
2	SPSM - Man	SPSM - Man	Pallet Box	Pallet Box	Manual	Manual	Pallet Box	Pallet Box	Floor	Truck	M, Tu, W, Th, F	Tu, F, Su
3	PPSM - Man	PPSM - Man	Cardboard box	Cardboard box	Manual	Manual	Cardboard Box	Cardboard Box	Truck	Truck	M, Tu, W, Th, F	M, Tu, W, Th, F
4	SPSM - Man	SPSM - Ded	Gaylord	Gaylord	Manual	Manual	Gaylord	Gaylord	Floor	Floor	M, W, F	M, Tu, Th
5	PPSM - Man	PPSM - Man	Gaylord	Gaylord	Manual	Manual	OTR	OTR	Floor	Floor	M, W, F	M, W, F
6	PPSM - Sort	PPSM - Ded	Gaylord	Gaylord	Mech / Man	Mech / Man	Gaylord	Gaylord	Floor	Floor	Tu, Th, W, F	M, W, Th
7	PPSM - Sort	PPSM - Ded	Cardboard box	Cardboard box	Manual	Manual	Cardboard Box	Cardboard Box	Floor	Floor	M, Tu, W, Th, F	Tu, Th, Su
8	PPSM - Ded	PPSM - Ded	Gaylord	Gaylord	Manual	Manual	Gaylord	Gaylord	Floor / Truck	Floor / Truck	M, W, F	M, Tu, Th
9	PPSM - Sort	PPSM - Sort	Gaylord	Gaylord	Manual	Manual	Pallet	Pallet	Floor	Floor	M, Tu, W, F	M, W, F
10	PPSM - Man	PPSM - Man	Pallet Box	Pallet Box	Mech / Man	Mech / Man	Pallet	Pallet	Floor / Truck	Truck	M, Tu, W, Th, F	M, Tu, W, Th, F
11	SPSM - Man	SPSM - Man	Cardboard box	Cardboard box	Manual	Manual	Cardboard Box	Cardboard Box	Truck	Truck	M, Tu, W, Th, F	M, Tu, W, Th, F
12	PPSM - Man	PPSM - Man	Gaylord	Gaylord	Mech / Man	Mech / Man	Gaylord	Gaylord	Floor	Floor	M, Tu, W, Th, F	Su, Tu, F
13	PPSM - Ded	PPSM - Ded	Gaylord	Gaylord	Mech / Man	Mech / Man	Gaylord	Gaylord	Floor	Floor	M, W, F	M, W, F
14	PPSM - Man	PPSM - Man	Cardboard box	Cardboard Box	Manual	Manual	Cardboard Box	Cardboard Box	Floor	Floor	M, Tu, W, Th, F	Tu, Th
15	SPSM - Man	SPSM - Man	4' Pallet Box	4' Pallet Box	Manual	Manual	Pallet	Pallet	Floor	Floor	M, Tu, W, Th, F	M, W, F
16	PPSM - Man	PPSM - Sort	Pallet Box	Pallet Box	Manual	Manual	Pallet Box	GPC	Floor	Floor	M, W, F	Tu, Th, Su
17	PPSM - Ded	PPSM - Ded	Gaylord	Gaylord	Manual	Manual	Pallet	Pallet	Truck	Truck	M, Tu, W, Th, F	Tu, Th, Su
18	PPSM - Sort	PPSM - Sort	Pallet Box	Pallet Box	Manual	Manual	Pallet Box	Pallet Box	Floor	Floor	M, W, F	Tu, Th, Su
19	PPSM - Sort	PPSM - Sort	Rolling Stock	Gaylord	Manual	Manual	Rolling Stock	Gaylord	Floor	Floor	M, Tu, W, Th, F	M, Tu, F
20	SPSM - Sort	SPSM - Sort	Gaylord	Gaylord	Manual	Manual	Gaylord	Gaylord	Floor	Floor	M, W, F	M, Tu, Th
21	SPSM - Man	SPSM - Man	Gaylord	Gaylord	Mech / Man	Mech / Man	Gaylord	Gaylord	Floor	Floor	W, Su	M, Tu, W, Th, F

Ded - Dedicated runouts feed containers  
 Man - Dedicated runouts with manual loading  
 Sort - No dedicated runouts with manual sorting

**PRS MAIL VOLUME (JULY 2004 - JUNE 2005)**

<b>No.</b>	<b>Total PRS Volume</b>
1	436,510
2	365,712
3	377,127
4	222,237
5	357,789
6	610,645
7	276,390
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16	462,792
17	353,486
18	480,933
19	767,748
20	158,861
21	321,300
	8,422,767

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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?

**RESPONSE:**

(a) My reasoning for making this change is explained in Docket No. MC2006-1, USPS-T-2, page 5 at lines 5-20. In order to be consistent, it is my understanding that the 303 delivery days figure should probably have been used in Docket No. MC2003-2. The 250 days figure looks, in my opinion, to reflect the number of work days per year per employee (total possible work days less vacation and holidays).

(b) I have not attempted to determine exactly what analyses rely on the 303 delivery days per year figure; it is my understanding that any analysis which requires a delivery days per year figure typically relies on the figure I have used in the instant proceeding. Furthermore, it appears more reasonable to me. The Postal Service (predominantly) processes and delivers mail six days per week, excluding holidays. When one multiplies 6 days per week by 52 weeks per year, the total number of days is 312 days. When the number of postal holidays (10) is subtracted, the number of delivery days per year is 302. I do not know why 303 delivery days per year, rather than 302, is the official figure used for estimating purposes.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

**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.

**RESPONSE:**

I think a better way to express what is in the cost study is to say that the only acceptance costs that have been provided are those associated with accepting a PRS mail piece through window service channels. The cost savings could vary by method, but I am not aware of any data which might be available and could be used to quantify the costs for the other methods. As far as the percentage distribution by channel, it is my understanding that those data are not available. It should be noted that acceptance cost savings are only a small component of the total PRS cost savings as indicated below:

RBMC Machinable	2.38 %	RDU Machinable	1.49 %
RBMC Non-Machinable	0.47 %	RDU Non-Machinable	0.30 %
RBMC Oversize	0.18 %	RDU Oversize	0.11 %

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T2-16.** In the Experimental Parcel Return Services case, Docket No. MC2003-2, witness Eggleston was asked and answered (Tr.2/171) the following interrogatory.

**OCA/USPS-T2-17.** The following interrogatory seeks to clarify the method of calculating the cost differences between Intra-BMC, RBMC and RDU parcels. In your testimony, you indicate that RDU and RBMC parcels will incur less mail processing and transportation costs than an Intra-BMC parcel. RBMC and RDU parcels are picked up by the retailer or its agent; thus the USPS will not incur carrier delivery costs. Please explain where in your cost analysis you account for the carrier delivery cost savings. If you did not consider carrier delivery cost savings, please explain fully why you did not do so.

**RESPONSE:**

My analysis did not account for any potential carrier delivery cost savings. In keeping with my conservative approach to estimating cost savings, it was not deemed necessary to attempt such a calculation.

Please provide your response to the same interrogatory. If your answer is the same as witness Eggleston's response, please explain why you are being conservative when carrier cost savings are clearly savings that would logically be included in the cost savings model.

**RESPONSE:**

I did not consider carrier delivery cost savings because it is my understanding that the rate design was not intended to differentiate based on type of delivery, and the pick up of parcels is generally viewed as "bulk delivery." Furthermore, such savings may not necessarily be achieved due to the implementation of PRS. In the absence of PRS, it is possible that mailers would still have retrieved their parcels in bulk. Finally, I am not aware of any data that could have been used to measure such savings.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T2-17.** Please confirm that if the carrier delivery cost savings were calculated, then, consistent with your cost savings model, that calculation would be appropriately included as an additional Attachment to your testimony and its result included in your Summary of Estimated Cost Differences Compared to Benchmark (Attachment A, page 1) as a new column labeled "delivery cost savings." If you do not confirm, please explain.

**RESPONSE:**

Not confirmed. Please see my response to OCA/USPS-T2-16.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-T2-18.** Please estimate the carrier delivery cost savings and provide your assumptions, calculations and sources. Please use data and methodologies applied in Commission's opinion in Docket No. R2005-1, issued November 1, 2005. If you are not able to estimate the carrier delivery cost savings, please explain.

**RESPONSE:**

Please see my response to OCA/USPS-T2-16.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

1. Please refer to USPS-T-2, attachment B, page 4. The value given for "Docket No. MC2003-2 Unit Cost Estimate" is \$0.014. However, in Docket MC2003-2, USPS-T-2, Attachment B, page 4, which is footnoted as the source for the above mentioned value, the unit cost estimate is listed as \$0.015. Please explain this difference and supply updated attachments if the unit cost should not have been listed as \$0.014.

**RESPONSE:**

The original figure was incorrect. The attachment has been updated accordingly.

**Intra-BMC Bulk Acceptance/Verification Cost Methodology**

Docket No. MC2003-2 Unit Cost Estimate	1/	\$0.015
TY 2003 Window Service Wage Rate	2/	\$32.306
TY 2006 Window Service Wage Rate	3/	\$36.344
Cost Escalation Factor	4/	1.125
TY 2006 Unit Cost Estimate	5/	\$0.016

**Sources**

- 1/: Docket No. MC2003-2, USPS-T-2, Attachment B, page 4
- 2/: Docket No. MC2003-2, USPS-T-2, Attachment C, page 4
- 3/: Docket No. MC2006-1, USPS-T-2, Attachment C, page 4
- 4/: (3) / (2)

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

2. Please refer to Excel file USPS-T-2\_Attachments\_FINAL, sheet "Convers\_C6". Column [3] computes "Cubic Feet Per Container", using the measurements given in column [2]. Please confirm that cell G13 should contain the equation  $=46.5/12*38.5/12*70/12$  (with 70 replacing 69), due to the measurements in column 2 being 46.5X38.5X70. If confirmed, please update the workpaper accordingly. If not confirmed, please explain the rationale for using 69.

**RESPONSE:**

Confirmed. The attachment has been updated accordingly. I have also included a revised sheet B4 to make the change pointed out regarding the PRC version in question

7.

Attachment 1 to response to POIR No. 1, question 2

Conversion Factor Calculations

Container Type	Outside Dim. Per Container (Inches) [1]	Inside Dim. Per Container (Inches) [2]	Cubic Feet Per Container [3]	Effective Parcel Capacity (# of Parcels) [4]	Capacity at Average Fullness (# of Parcels) [5]	Average % FULL [6]
<b>Machinable</b>						
Pallet	48x40x48	48x40x48	53.3	125.6	106.8	85%
Postal Pak	48x40x69	46.5x38.5x69	71.5	153.1	130.1	85%
Pallet Box	48x40x69	46.5x38.5x69	71.5	153.1	134.7	88%
Pallet Box (for space)	48x40x70	46.5x38.5x70	72.5	155.3	116.5	75%
Sacks on In-house Container	65x41.5x36	65x41.5x36	56.2	120.3	102.3	85%
<b>NMOs</b>						
Pallet	48x40x48	48x40x48	53.3	19.2	19.2	100%
Pallet Box	48x40x69	46.5x38.5x69	71.5	23.4	19.9	85%
In-house Container	65x41.5x36	65x41.5x36	56.2	18.4	15.6	85%
<b>Oversize NMOs</b>						
108"-130" on Pallet	48x40x48	48x40x48	53.3	6.7	6.7	100%
108"-130" in IHC	65x41.5x36	65x41.5x36	56.2	6.4	6.4	100%

Pieces Per Container	Machinable		Nonmachinable		108"-130"
	R2000-1 (FY98) [7]	R2005-1 (FY04) [8]	R2000-1 (FY98) [9]	R2005-1 (FY04) [10]	R2005-1 (FY04) [11]
Sack	5.1	7.0	n/a	n/a	n/a
Sack in OTR	81.8	112.0	n/a	n/a	n/a
OTR	69.0	94.5	27.1	19.5	6.8
APC	35.7	48.8	14.0	10.1	3.5
Hamper	23.0	31.5	9.0	6.5	2.3

	Cubic Feet Per Parcel Post			No. of Sacks	No. of Sacks
	Machinable [12]	NMO [13]	108"-130" [14]	on IHC [15]	on Postal Pak [16]
R2005-1 (BY04)	0.425	2.777	7.94	14.61	18.59
R2000 (BY98)	0.581	1.992			

SOURCES

- Column [1] & [2]: Container Methods Handbook PO-NC2, September 1992; USPS LR-14-133
- Column [3]: Length \* width \* height / 12 \* 12 \* 12
- Column [4]: (column [3]) \* air factor / to account for "effective cube" and (column [3]) \* (column [14]) \* air factor and (column [3]) / ((column [16]) \* air factor)
- Column [5]: Air factor = 1 for pallets, and 1.1 for all else
- Column [6]: Effective cubic capacity (column [4]) \* average % fullness (column [6])
- Column [7]: Pallets, postal paks and IHCS should be as full as practicable before dispatch so it is reasonable to assume these containers will be at least 85% full. The majority of pallet boxes come from mailers who must have 75 percent full boxes, and tend to fill them to maximize capacity. Therefore 88 percent, the average of 75 and 100 percent was used.
- Column [8]: Docket No. R84-1, Exhibit USPS-14
- Column [9]: Pieces per container in Docket No. R84-1 (column [7]) \* FY82 cubic feet per piece (column [14]) - FY98 cubic feet per piece (column [14])
- Column [10]: Docket No. R84-1, Exhibit USPS-14
- Column [11]: Pieces per container in Docket No. R84-1 (column [9]) \* FY82 cubic feet per piece (column [14]) - FY98 cubic feet per piece (column [14])
- Column [12]: Column [10] / column [13] - column [15]
- Column [13]: Attachment C, page 5, column [7], machinable parcels
- Column [14]: Attachment C, page 5, column [7], nonmachinable parcels
- Column [15]: Attachment C, page 5, column [7], oversize parcels
- Column [16]: No. of parcels on IHC (column 5) divided by no. of parcels in a sack (column 8)
- Column [17]: No. of parcels on a parcel (column 5) divided by no. of parcels in a sack (column 8)

## Attachment 2 to response to POIR No. 1, question 2

Attachment C  
Page 4 of 15  
REVISED 10/21/05**Piggyback Factors, Wages, Mail Flow Operating Assumptions**

<b>Wage Rate with Premium Pay Factor Applied</b>	\$35.371	1/
<b>Premium Pay Factor</b>	0.989	2/
<b>TY Other mail processing wage rate</b>	\$35.772	3/
<b>Window Service Adjustment Factor</b>	1.075	4/
Window Service Base year wage rate	33.804	5/
Window Service Test year wage rate	36.344	6/
<b>Mail Processing Operation Specific Piggyback Factors</b>		
NMO Sorting at BMC	1.571	7/
Other Operations at BMCs	1.545	7/
Platform BMC	1.622	7/
Primary Parcel Sorting Machine	2.145	7/
Secondary Parcel Sorting Machine	5.391	7/
Sack Sorting Machine - BMC	2.159	7/
NMO Sorting at SCF	1.419	7/
Platform Non-BMC	1.458	7/
NonMODS Allied	1.738	7/
NonMODSMANP	1.510	7/
Window Service Piggyback factor (Parcel Post)	1.348	8/
<b>Mail Flow Operating Assumptions</b>		
Percent with direct transportation to destinating delivery unit from BMC	12.3%	9/
Percent Sorted to 5-Digits by Primary Parcel Sorting Machine	20.1%	10/
Destinating BMCs will feed barcoded destinating mail unfiltered to secondary	20.8%	11/
Probability that mail fed directly to nonspecific secondary will receive more than one sort	50.0%	12/
Probability that barcode on secondary will not be readable	3.0%	13/
Proportion of parcel singulators (SSIU) being at secondary	100.0%	14/
Proportion sent from secondary to primary due to SSIU	0.0%	15/
Probability of inter-BMC parcel going to primary psm at destination BMC	83.4%	16/
Probability of Inter-BMC parcel being handled by SSIU in destination BMC	94.5%	17/
Probability of Intra-BMC and DBMC parcels going to primary psm (or get keyed)	100.00%	18/
Probability of Intra-BMC and DBMC on secondary psm	79.9%	19/
Probability that NMOs will NOT be inducted on the conveyor system (not used for NMOs over 10)	41.2%	20/
Probability that NMOs will be NOT be moved using towveyor (not used for pallets)	31.4%	20/
Probability that PRS machinable mail pieces are processed on the PPSM	97.4%	21/
Probability that PRS machinable mail pieces are processed on the SPSM	24.8%	21/

**Sources**

- 1/ (2) x (3)  
2/ Docket No R2005-1, USPS-LR-K-55  
3/ Docket No R2005-1, USPS-LR-K-55  
4/ (6) / (5)  
5/ Docket No. R2005-1, USPS-LR-K-55  
6/ Docket No R2005-1, USPS-LR-K-55  
7/ Docket No R2005-1, USPS-LR-K-52  
8/ Docket No R2005-1, USPS-LR-K-52  
9/ USPS LR-PCR-40, page 64  
10/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [10]  
11/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [9]  
12/ Assumption that mail going to secondary PSM will be evenly split between scheme 1 and scheme 2.  
13/ Assumption used by Operations  
14/ Assumption used by Operations  
15/ (14) x (15)  
16/  $[1 - (12)] + [(16) \times (12)] + \{[(1) - (12)] \times [(1) - (11)] \times (16)\} + \{(11) \times (12) \times [(1) - (16)]\}$   
17/  $(12) + [(11) \times (13)] + [1 - (12)] \times [(1) - (11)]$   
18/  $1 + [1 - (11)] \times (16)$   
19/  $1 - (11)$   
20/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [11]

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

5. Please refer to the Excel file that was provided with the answers to OCA/USPS-T2-9-10, sheet "Avg Storage Days." To calculate the storage days for each BMC, six (the number of delivery days per week) is divided by the number of participant 2's pickup days, taken from the sheet entitled, "Survey Results." Why were participant 1's data never used in the calculation of the average storage days?

**RESPONSE:**

The Postal Service has not been reporting data due to the fact that there are currently only two PRS participants. It is my understanding that these data have therefore not been maintained at the mailer level. In order to be conservative, I relied on the figures for participant 2, which retrieved its mail slightly less frequently.

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

6. Please refer to the cost sheets that were supplied with the supplemental responses to OCA/USPS-13 and 15, Attachment F, column [3] (piggyback factors.) The source for the piggyback factors is listed as PRC-LR-6, file "PRC MPPG TY06.XLS", worksheet A, cell M49, which is the piggyback factor for "LDC 43 – Unit Distribution – Manual." However, the USPS version of the cost sheets that was originally supplied with T-2 did not use this piggyback factor; it used the piggyback factor for "Parcels – Manual." Why was the piggyback factor used from PRC-LR-6 "LDC 43 – Unit Distribution - Manual" instead of "Parcels – Manual" in the cost sheets supplied for these supplemental responses?

**RESPONSE:**

The piggyback factor for "Parcels - Manual" should have been used. The attachment has been updated accordingly. The updated attachment also addresses the issues raised in POIR No. 1, Questions 1 and 2.

REV 2/05

**Scanning Cost Estimates**

PRS Rate Category	Transaction Time (hours) [1]	Wage Rate [2]	Piggyback Factor [3]	Cost per active scan [4]	Number of active scans [5]	Scan Cost [6]
RBMC - Machinable	0.0007	\$35.371	1.508	\$0.036	0	\$0.000
RBMC - Non-machinable	0.0007	\$35.371	1.508	\$0.036	0	\$0.000
RBMC - Oversize	0.0007	\$35.371	1.508	\$0.036	0	\$0.000
RDU - Machinable	0.0007	\$35.371	1.508	\$0.036	2	\$0.073
RDU - Non-machinable	0.0007	\$35.371	1.508	\$0.036	2	\$0.073
RDU - Oversize	0.0007	\$35.371	1.508	\$0.036	3	\$0.109

**Sources**

- [1]: Docket No. R2000-1, USPS-T-30, Section A, Data Sheet A-8
- [2]: Attachment C, page 4, Premium Pay Adjusted Wage Rate.
- [3]: Docket No. R2005-1, PRC-LR-6, file "PRC MPPG TY06.XLS", worksheet A, cell M22
- [4]: [1] x [2] x [3]. Follows methodology shown in Docket No. R2001-1 LR-J-135.
- [5]: Assumption taken from USPS product description.
- [6]: [4] x [5].

### Intra-BMC Bulk Acceptance/Verification Cost Methodology

Docket No. MC2003-2 Unit Cost Estimate	1/	\$0.015
TY 2003 Window Service Wage Rate	2/	\$32.306
TY 2006 Window Service Wage Rate	3/	\$36.344
Cost Escalation Factor	4/	1.125
TY 2006 Unit Cost Estimate	5/	\$0.016

#### Sources

- 1/: Docket No. MC2003-2, USPS-T-2, Attachment B, page 4
- 2/: Docket No. MC2003-2, USPS-T-2, Attachment C, page 4
- 3/: Docket No. MC2006-1, USPS-T-2, Attachment C, page 4
- 4/: (3) / (2)

Attachment 3 to response to POIR No. 1, question 6

PRC Version  
Attachment C  
Page 6 of 15  
REVISED 12/21/05

Conversion Factor Calculations

Container Type	Outside Dim. Per Container (Inches) [1]	Inside Dim. Per Container (Inches) [2]	Cubic Feet Per Container [3]	Effective Parcel Capacity (# of Parcels) [4]	Capacity at Average Fullness (# of Parcels) [5]	Average % FULL [6]
<b>Machinable</b>						
Pallet	48x40x48	48x40x48	53.3	125.6	106.8	85%
Postal Pak	48x40x69	46.5x38.5x69	71.5	153.1	130.1	85%
Pallet Box	48x40x69	46.5x38.5x69	71.5	153.1	134.7	88%
Pallet (no air space)	48x40x70	46.5x38.5x70	72.5	155.3	116.5	75%
Warehouse Container	65x41.5x36	65x41.5x36	56.2	120.3	102.3	85%
<b>NMOs</b>						
Pallet	48x40x48	48x40x48	53.3	19.2	19.2	100%
Pallet Box	48x40x69	46.5x38.5x69	71.5	23.4	19.9	85%
Warehouse Container	65x41.5x36	65x41.5x36	56.2	18.4	15.6	85%
<b>Over-size NMOs</b>						
108"-130" on Pallet	48x40x48	48x40x48	53.3	6.7	6.7	100%
108"-130" in IHC	65x41.5x36	65x41.5x36	56.2	6.4	6.4	100%

Pieces Per Container	Machinable		Nonmachinable		108"-130"
	R2000-1 (FY98) [7]	R2005-1 (FY04) [8]	R2000-1 (FY98) [9]	R2005-1 (FY04) [10]	R2005-1 (FY04) [11]
bulk	5.1	7.0	n/a	n/a	n/a
bulk in OTR	81.8	112.0	n/a	n/a	n/a
OTR	69.0	94.5	27.1	19.5	6.8
OTR	35.7	48.8	14.0	10.1	3.5
Warehouse	23.0	31.5	9.0	6.5	2.3

	Cubic Feet Per Parcel Post			No. of Sacks on IHC	No. of Sacks on Postal Pak
	Machinable [12]	NMO [13]	108"-130" [14]	[15]	[16]
R2005-1 (BY04)	0.425	2.777	7.94	14.61	18.59
R2000 (BY98)	0.581	1.992			

FOOTNOTES

- Column [1]: Conversion Methods Handbook PO-502 (September 1992) USPS LR-N-133
- Column [2]: Length \* width \* height / (12\*12\*12)
- Column [3]: Column [1] \* column [13] \* air factor, to account for "effective cube" and (column [3]) / ((column [14]) \* air factor) and (column [3]) / ((column [16]) \* air factor). Air factor = 1 for pallets, and 1.1 for all else.
- Column [4]: Effective cubic capacity (column [4]) \* average % fullness (column [6]).
- Column [5]: Pallets, postal paks and IHCs should be as full as practicable before dispatch so it is reasonable to assume these containers will be at least 85% full. The makers of pallet boxes come from makers who must have 75 percent full boxes, and tend to fill them to maximize capacity. Therefore 85 percent, the average of 75 and 100 percent was used.
- Column [7]: Docket No. RB4-1, Exhibit USPS-14.
- Column [8]: Pieces per container in Docket No. RB4-1 (column [7]) \* FY02 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [9]: Docket No. RB4-1, Exhibit USPS-14.
- Column [10]: Pieces per container in Docket No. RB4-1 (column [9]) \* FY02 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [11]: Column [10] \* column [13] / column [15].
- Column [12]: Attachment C, page 5, column [7], machinable parcels.
- Column [13]: Attachment C, page 5, column [7], non-machinable parcels.
- Column [14]: Attachment C, page 5, column [7], over-size parcels.
- Column [15]: No. of parcels on IHC (column 5) divided by no. of parcels in a sack (column 8).
- Column [16]: No. of parcels on a parcel (column 5) divided by no. of parcels in a sack (column 8).

USPS-T-2

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

PARCEL RETURN SERVICES

Docket No. MC2006-1

DIRECT TESTIMONY  
OF  
MICHAEL W. MILLER  
ON BEHALF OF  
UNITED STATES POSTAL SERVICE

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**DIRECT TESTIMONY  
OF  
MICHAEL W. MILLER**

**AUTOBIOGRAPHICAL SKETCH**

My name is Michael W. Miller. I am an Economist in Special Studies at the United States Postal Service. Special Studies is a unit of Corporate Financial Planning in Finance at Headquarters. I have testified before the Postal Rate Commission on nine separate occasions.

Most recently, I presented two direct testimonies on behalf of the Postal Service in Docket No. R2005-1. The first testimony covered First-Class Mail, Periodicals, and Standard Mail flats mail processing unit cost estimates. The second testimony presented Parcel Post, Bound Printed Matter, and Media Mail / Library Mail cost estimates.

In Docket No. C2004-1, I testified as a witness in opposition to the Time Warner, et al. complaint case.

In Docket No. R2001-1, I sponsored two separate testimonies as a direct witness on behalf of the Postal Service. The first testimony presented First-Class Mail letters/cards and Standard Mail letters mail processing unit cost estimates and worksharing related savings estimates, the Qualified Business Reply Mail (QBRM) worksharing related savings estimate, the nonstandard surcharge/nonmachinable surcharge cost studies, and the Business Reply Mail (BRM) fee cost studies. The second testimony presented First-Class Mail, Periodicals, and Standard Mail flats mail processing unit cost estimates.

In Docket No. R2000-1, I testified as the direct witness presenting First-Class Mail letters/cards and Standard Mail letters mail processing unit cost estimates and worksharing related savings estimates. My testimony also included the cost study supporting the nonstandard surcharge. In that same docket, I also testified as a rebuttal witness. My testimony contested key elements of the worksharing discount proposals

presented by several First-Class Mail intervenors, as well as the Office of the Consumer Advocate (OCA).

In Docket No. R97-1, I testified as a direct witness concerning Prepaid Reply Mail (PRM) and QBRM mail processing cost avoidance estimates. In that same docket, I also testified as a rebuttal witness concerning the Courtesy Envelope Mail (CEM) proposal presented by the OCA.

Prior to joining the Special Studies unit in January 1997, I served as an Industrial Engineer at the Margaret L. Sellers Processing and Distribution Center in San Diego, California. In that capacity, I worked on field implementation projects. For example, I was the local coordinator for automation programs in San Diego such as the Remote Bar Coding System (RBCS) and the Delivery Bar Code Sorter (DBCS). I was also responsible for planning the operations for a new Processing and Distribution Center (P&DC) that was activated in 1993. In addition to field work, I have completed detail assignments within the Systems/Process Integration group in Engineering. My primary responsibility during those assignments was the development of Operating System Layouts (OSL) for new facilities.

Prior to joining the Postal Service, I worked as an Industrial Engineer at General Dynamics Space Systems Division, where I developed labor and material cost estimates for new business proposals. These estimates were submitted as part of the formal bidding process used to solicit government contracts.

I was awarded a Bachelor of Science degree in Industrial Engineering from Iowa State University in 1984 and a Master of Business Administration from San Diego State University in 1990. I also earned a Professional Engineer registration in the State of California in 1990 and a Methods Time Measurement (MTM) "blue card" certification in 2004.

## **I. PURPOSE AND SCOPE OF TESTIMONY**

The purpose of this testimony is to develop Test Year 2006 Parcel Return Service (PRS) cost estimates. Cost estimates can be found in Attachment A and are developed for both the Parcel Select Return Bulk Mail Center (RBMC) service and the Parcel Select Return Delivery Unit (RDU) service. These estimates are referenced in the testimony of witness Koroma (USPS-T-3) and rely on the cost methodology and cost model presented in Docket No. MC2003-2 by witness Eggleston (USPS-T-2). The cost model has been modified to incorporate Docket No. R2005-1 data, as well as information obtained from field personnel.

## **II. GUIDE TO TESTIMONY**

This testimony includes eight attachments:

- A. Cost Summary
- B. Acceptance Cost Estimates
- C. Mail Processing Cost Estimates
- D. Storage Cost Estimates
- E. Transportation Cost Estimates
- F. Scanning Cost Estimates
- G. Postage Due Cost Estimates
- H. Postage Due Survey Data

In addition, this testimony relies on data previously submitted to the Postal Rate Commission. These data are referenced, as necessary, in this testimony and the cost model contained in the attachments.

## **III. PARCEL RETURN SERVICE COST METHODOLOGY**

The PRS cost estimates have been separated into six categories: acceptance, mail processing, storage, transportation, scanning, and postage due. The analysis relies on a cost avoidance approach. Rather than estimating bottom-up costs, the cost difference between a benchmark and each rate category is measured. The benchmark is Intra-BMC Parcel Post.

## **A. ACCEPTANCE COST ESTIMATES**

The acceptance cost estimates are calculated in Attachment B. The analysis is limited to window service costs. It is also assumed that the PRS acceptance costs for the RBMC and RDU services are identical.

**Intra-BMC Acceptance Cost Estimates:** Intra-BMC mail pieces are assumed to be either entered individually through retail channels, where they must be weighed and rated, or entered in bulk at the BMEU.

The Test Year (TY) 2006 unit cost estimate for individual retail transactions can be found in Attachment B, page 2. The cost methodology used to develop this estimate is identical to that relied upon in Docket No. MC2003-2. A time estimate for a "weigh/rate" transaction has been taken from Table 3.1 of the transaction time study conducted in Docket No. R97-1, USPS-LR-H-167. A direct cost per transaction is then estimated by applying the Docket No. R2005-1 TY 2006 window service wage rate to the transaction time estimate. Window service adjustments have then been made using Base Year 2004 data from Docket No. R2005-1, USPS-T-5, Workpapers B. Finally, a window service piggyback factor is applied.

The unit cost estimate for bulk transactions can be found in Attachment B, page 4. This estimate relies on the TY 2003 estimate from Docket No. MC2003-2. A cost escalation factor has been calculated by dividing the Docket No. R2005-1 TY 2006 window service wage rate by the Docket No. R2001-1 TY 2003 window service wage rate. The TY 2006 bulk acceptance unit cost is estimated to be the product of the cost escalation factor and the Docket No. MC2003-2 bulk acceptance unit cost estimate.

**PRS Acceptance Cost Estimates:** The TY 2006 unit cost estimate for PRS mail pieces can be found in Attachment B, page 3. PRS mail pieces can be given to a carrier, placed in a collection box, or submitted to a window service clerk. The cost methodology used to develop this estimate is identical to that relied upon in Docket No. MC2003-2. A time estimate for an "acceptance" transaction has been taken from Table 3.1 of the Docket No. R97-1 transaction time study. A direct cost per transaction is then estimated by applying the Docket No. R2005-1 TY 2006 window service wage rate to the transaction time estimate. Window service adjustments have then been made using

Docket No. R2005-1 Base Year 2004 data. Finally, a window service piggyback factor is applied.

The acceptance cost differences between PRS and retail Intra-BMC and PRS and bulk Intra-BMC are measured in Attachment B, page 1. Those cost difference estimates are then weighted together using the Docket No. R2005-1 retail and bulk percentage figures, which are 38.5 percent and 61.5 percent, respectively. The aggregate cost difference estimate is then applied to all PRS rate categories, as shown in Attachment A, page 1.

#### **B. MAIL PROCESSING COST ESTIMATES**

The mail processing unit cost estimates by rate category are shown in Attachment C, page 1. Model cost estimates are developed for Intra-BMC, Return Bulk Mail Center (RBMC), and Return Delivery Unit (RDU) mail pieces that are machinable, nonmachinable, and oversized. CRA adjustment factors from the Docket No. R2005-1 Parcel Post cost models (USPS-LR-K-46) are then applied. For each rate category, the mail processing unit cost savings estimates are calculated to be the difference between the CRA-adjusted mail processing unit cost estimate for a given rate category and the CRA-adjusted mail processing unit cost estimate for the corresponding Intra-BMC rate category. For example, the mail processing unit cost savings estimate for the RBMC machinable rate category reflects the mail processing unit cost difference between an Intra-BMC machinable mail piece and a RBMC machinable mail piece.

**Intra-BMC Mail Processing Unit Cost Estimates:** The cost models found in Attachment C contain updated Test Year 2006 inputs (wage rates, piggyback factors, volumes, etc.) from Docket No. R2005-1, USPS-LR-K-46. In addition, they also contain the Parcel Post cost methodology changes I described in my USPS-T-20 testimony in that docket. Consequently, the Intra-BMC machinable, Non Machinable Outsides (NMO), and oversize CRA-adjusted mail processing unit cost estimates calculated in Attachment C, page 1 are identical to those developed in Docket No. R2005-1, USPS-LR-K-46.

**RBMC Mail Processing Unit Cost Estimates:** The RBMC cost models also contain the updated TY 2006 inputs and the Parcel Post cost methodology changes from Docket No. R2005-1. Other modifications have been made as well. Field

observations indicate that the Bulk Mail Centers (BMC) isolate the PRS mail on either the Primary Parcel Sorting Machine (PPSM) or the Secondary Parcel Sorting Machine (SPSM) and that the mail for both participants at a given facility is isolated using the same machine. A BMC survey has been conducted in order to determine the methods in which the 21 facilities are currently isolating PRS machinable mail pieces. Using the survey results and PRS mail volume data, coverage factors have been developed. It is estimated that 97.36 percent of the PRS machinable mail is processed through the PPSM and 24.82 percent is further processed on the SPSM.<sup>1</sup> These coverage factors have been incorporated into the RBMC machinable cost model found in Attachment C, page 10.

The RBMC machinable cost model from Docket No. MC2003-2 also contained a line item titled "sort parcels to mailers." That model was developed assuming that the PRS mail pieces for all participants would be sorted to a single parcel runout or chute, at which point they would have to be sorted by the participant's ID code in a separate operation. In reality, the mail pieces bear unique ZIP Codes. Most operations have been set up such that each participant's mail is sorted to dedicated runouts or chutes. In some instances, the mail may be sent to the same runout or chute as other parcels and require further sorting. This circumstance, however, occurs throughout PSM operations and is already reflected in the productivity figures for those operations. The "sort parcels to mailers" line item has therefore been deleted from the cost model in Attachment C, page 10.

The RBMC NMO and oversize cost models from Docket No. MC2003-2 both contained two line items titled "move NMOs to mach runoff" and "sort by mailer ID." During field observations, it became apparent that these mail pieces are sorted like any other mail pieces in NMO operations. Separate containers are located at the NMO mechanism for both participants. While NMO operations generally involve 3-digit separations, there are instances, especially for local mail, where 5-digit separations are being made. The "move NMOs to mach runoff" and "sort by mailer ID" tasks have

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<sup>1</sup> The PPSM coverage factor is less than 100 percent due to the fact that one facility inducts all outbound mail "direct-to-secondary."

therefore been deleted from the cost models, as it is assumed that these tasks would be covered by the NMO productivity figure.

**RDU Mail Processing Unit Cost Estimates:** The RDU cost models also contain the updated TY 2006 inputs and the Parcel Post cost methodology changes from Docket No. R2005-1. Based on initial field observations, it has been determined that no other modifications are necessary.

### **C. STORAGE COST ESTIMATES**

The storage cost methodology in the instant proceeding follows that used by witness Eggleston in Docket No. MC2003-2. Updated cost model inputs for cost of space have been obtained from Docket No. R2005-1, USPS-LR-K-52. Furthermore, two other changes have been made, both of which concern the RBMC storage costs only. The first change concerns the number of storage days. Witness Eggleston converted the annual cost of space to a daily cost of space using 250 days per year. It is my understanding that these data are expressed in terms of delivery days. Furthermore, other postal analyses assume that there are 303 delivery days per year. Consequently, I have used the latter figure. Witness Eggleston's cost model also assumed two storage days for RBMC mail pieces. The BMC survey described above asked the respondents for the specific days of the week the participants picked up their PRS mail pieces. The number of storage days for each BMC has been calculated by dividing six delivery days by the number of pick-up days per week. Using PRS BMC-specific volume data, the weighted average number of storage days is calculated to be 1.834 storage days. That figure has been incorporated into Attachment D, page 1.

### **D. TRANSPORTATION COST ESTIMATES**

Transportation cost estimates can be found in Attachment E, page 1. The transportation cost methodology relied upon in this docket is identical to the four-step approach used in Docket No. MC2003-2.<sup>2</sup> Test Year 2006 Parcel Post transportation data from Docket No. R2005-1, USPS-LR-K-89 have been incorporated into the cost model. The magnitude of the transportation results has also been affected by the Docket No. R2005-1 average cubic volume for a machinable Parcel Post mail piece, which is smaller than the figure relied upon in Docket No. MC2003-2.

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<sup>2</sup> Please see Docket No. MC2003-2, USPS-T-2, page 6 at line 12 to page 8 at line 10.

### **E. SCANNING COST ESTIMATES**

The scanning cost estimates have been developed using a methodology identical to that used in Docket No. MC2003-2. RDU machinable and non-machinable mail pieces require two "active" scans. RDU oversized mail pieces require three active scans. No active RBMC scans are required. The basis for the Docket No. MC2003-2 estimate is the time required for a box section clerk to perform a delivery confirmation scan. That time estimate was obtained from Docket No. R97-1. A more recent estimate can be found in Docket No. R2000-1, USPS-T-30, Section A, Data Sheet A-8. That estimate of 2.46 seconds has been relied upon in the instant proceeding. A Docket No. R2005-1 wage rate and piggyback factor have also been incorporated into the analysis.

### **F. POSTAGE DUE COST ESTIMATES**

Postage due cost estimates are calculated using a cost methodology identical to that relied upon in Docket No. MC2003-2. These cost estimates have been developed for RBMC only. It is assumed that there are no postage due costs for RDU mail pieces. The current sampling matrix can be found in Attachment G, page 2. The sampling operations survey that was presented in USPS-T-2, Attachment H in Docket No. MC2003-2 is again relied upon in the instant proceeding. A Docket No. R2005-1 wage rate and piggyback factor have also been incorporated into the analysis.

## **IV. SUMMARY OF RESULTS**

The total unit cost savings estimates by rate category are shown in Table 1 below:

**TABLE 1: PRS UNIT COST SAVINGS ESTIMATES**

<b>CATEGORY</b>	<b>RBMC</b>	<b>RDU</b>
<b>Machinable</b>	<b>(\$1.421)</b>	<b>(\$2.270)</b>
<b>Non Machinable</b>	<b>(\$7.146)</b>	<b>(\$11.384)</b>
<b>Oversize</b>	<b>(\$19.096)</b>	<b>(\$30.513)</b>

**Summary of Estimated Cost Differences Compared to Benchmark**

	Acceptance [1]	Mail Processing [2]	Storage [3]	Transportation [4]	Scanning [5]	Postage Due [6]	Total [7]
<b>RBMC</b>							
Machinable	(\$0.034)	(\$0.532)	\$0.014	(\$0.939)	\$0.000	\$0.070	(\$1.421)
Non-machinable	(\$0.034)	(\$1.134)	\$0.096	(\$6.144)	\$0.000	\$0.070	(\$7.146)
Oversize	(\$0.034)	(\$1.857)	\$0.284	(\$17.560)	\$0.000	\$0.070	(\$19.096)
<b>RDU</b>							
Machinable	(\$0.034)	(\$1.306)	\$0.039	(\$1.037)	\$0.069	\$0.000	(\$2.270)
Non-machinable	(\$0.034)	(\$4.897)	\$0.262	(\$6.784)	\$0.069	\$0.000	(\$11.384)
Oversize	(\$0.034)	(\$11.970)	\$0.775	(\$19.387)	\$0.103	\$0.000	(\$30.513)

**Sources**

- [1]: Attachment B, page 1.
- [2]: Attachment C, page 1.
- [3]: Attachment D, page 1.
- [4]: Attachment E, page 1.
- [5]: Attachment F, page 1.
- [6]: Attachment G, page 1.
- [7]: Sum of [1] through [6].

## Acceptance Cost Difference Summary (per piece)

### Retail Cost Difference

	Unit Costs	
PRS	\$0.237	1/
Intra-BMC (retail)	\$0.677	2/
<b>Cost Difference</b>	<b>(\$0.440)</b>	<b>3/</b>

### Bulk Cost Difference

	Unit Costs	
PRS	\$0.237	4/
Intra-BMC (bulk)	\$0.016	5/
<b>Cost Difference</b>	<b>\$0.221</b>	<b>6/</b>

### Weighted Average Cost Difference

	Distribution [1]	Cost Difference [2]	
Entered at Window (Retail)	38.5%	(\$0.440)	2a
Entered in Bulk (Non-retail)	61.5%	\$0.221	2b
<b>Weighted Average Cost Difference per piece</b>		<b>(\$0.034)</b>	<b>2c</b>

### Sources

- 1/: Attachment B, page 3.
- 2/: Attachment B, page 2.
- 3/: (1) -(2).
- 4/: Attachment B, page 3.
- 5/: Attachment B, page 4.
- 6/: (4) - (5).

[1]: Docket R2005-1, USPS-LR-K-46, page 6.

[2]: Estimated cost differences

[2a]: (3).

[2b]: (6).

[2c]: Estimated costs in [2a] and [2b] weighted by percentages in [1].

**Intra-BMC Retail Transactions**  
**Cost Per "Weight/Rate" Transaction**

Transaction Time (in seconds)			64.800	1/
Transaction Time (in minutes)			1.080	2/
TY 06 Wage Rate (per hour)			\$36.344	3/
TY 06 Wage Rate (per minute)			\$0.606	4/
Direct Cost per transaction			\$0.654	5/
Misc. Volume Variable Window Costs	9.52% x	\$0.654 =	\$0.062	6/
			+ <u>\$0.654</u>	
			\$0.716	
Waiting Time Adjustment	26.64% x	\$0.654 =	\$0.174	7/
			+ <u>\$0.716</u>	
			\$0.891	
Variability	56.37% x	\$0.891 =	\$0.502	8/
Piggyback Factor	1.348 x	\$0.502 =	\$0.677	9/
Cost per minute for Retail Transaction		=	\$0.677	10/

**Sources**

- 1/: Docket No. R97-1, LR-H-167 (Transaction Time Study), Table 3.1, page 160, "weight/rate" tas  
 2/: (1) / 60.  
 3/: Attachment C, page 4, line (6).  
 4/: (3) / 60.  
 5/: (2) x (4).  
 6/: Docket No. R2005-1, USPS-LR-K-5, Workpapers B, Worksheet 3.2.1  
 (break time, clocking in and out, moving equip.).  
 7/: Docket No. R2005-1, USPS-LR-K-5, Workpapers B, Worksheet 3.2.1  
 8/: Docket No. R2005-1, USPS-LR-K-5, Workpapers B, Worksheet 3.2.1  
 9/: Docket No. R2005-1, USPS-LR-K-52  
 10/: Product from (9).

**PRS Retail Transactions  
Cost Per "Acceptance" Transaction**

Transaction Time (in seconds)		22.650	1/
Transaction Time (in minutes)		0.378	2/
TY 06 Wage Rate (per hour)		\$36.344	3/
TY 06 Wage Rate (per minute)		\$0.606	4/
Direct Cost per transaction		\$0.229	5/
Misc. Volume Variable Window Costs	9.52% x \$0.229 =	\$0.022	6/
		+ <u>\$0.229</u>	
		\$0.250	
Waiting Time Adjustment	26.64% x \$0.229 =	\$0.061	7/
		+ <u>\$0.250</u>	
		\$0.311	
Variability	56.37% x \$0.311 =	\$0.176	8/
Piggyback Factor	1.348 x \$0.176 =	\$0.237	9/
Cost per minute for Retail Transaction		= \$0.237	10/

Sources

- 1/: Docket No. R97-1, LR-H-167 (Transaction Time Study), Table 3.1, page 160, "accepta
- 2/: (1) / 60.
- 3/: Attachment C, page 4, line (6).
- 4/: Row (3) / 60.
- 5/: (2) x (4).
- 6/: Docket No. R2005-1, USPS-LR-K-5, Workpapers B, Worksheet 3.2.1 (break time, clocking in and out, moving equip.).
- 7/: Docket No. R2005-1, USPS-LR-K-5, Workpapers B, Worksheet 3.2.1.
- 8/: Docket No. R2005-1, USPS-LR-K-5, Workpaper B, Worksheet 3.2.1.
- 9/: Docket No. R2005-1, USPS-LR-K-52
- 10/: Product from (9).

### Intra-BMC Bulk Acceptance/Verification Cost Methodology

Docket No. MC2003-2 Unit Cost Estimate	1/	\$0.014
TY 2003 Window Service Wage Rate	2/	\$32.306
TY 2006 Window Service Wage Rate	3/	\$36.344
Cost Escalation Factor	4/	1.125
TY 2006 Unit Cost Estimate	5/	\$0.016

#### Sources

- 1/: Docket No. MC2003-2, USPS-T-2, Attachment B, page 4
- 2/: Docket No. MC2003-2, USPS-T-2, Attachment C, page 4
- 3/: Docket No. MC2006-1, USPS-T-2, Attachment C, page 4
- 4/: (3) / (2)

## Mail Processing Cost Estimate Summary Page

### Estimated Mail Processing Costs

	Modeled Costs [1]	CRA Adjustment Factors		Adjusted Costs [4]	
		Proportional [2]	Fixed [3]		
Intra-BMC Machinable	\$1.222	1.219	\$0.120	\$1.609	4a
Intra-BMC Non Machinable	\$4.353	1.219	\$0.120	\$5.424	4b
Intra-BMC Oversize	\$10.588	1.219	\$0.120	\$13.022	4c
RBMC Machinable	\$0.785	1.219	\$0.120	\$1.077	4d
RBMC Nonmachinable	\$3.422	1.219	\$0.120	\$4.290	4e
RBMC Oversize	\$9.064	1.219	\$0.120	\$11.165	4f
RDU Machinable	\$0.150	1.219	\$0.120	\$0.303	4g
RDU Nonmachinable	\$0.334	1.219	\$0.120	\$0.527	4h
RDU Oversize	\$0.765	1.219	\$0.120	\$1.052	4i

### Estimated Mail Processing Cost Differences

Rate Category	Benchmark	Cost Difference [5]	
RBMC Machinable	Intra-BMC mach	(\$0.532)	5a
RBMC Nonmachinable	Intra-BMC nmo	(\$1.134)	5b
RBMC Oversize	Intra-BMC over	(\$1.857)	5c
RDU Machinable	Intra-BMC mach	(\$1.306)	5d
RDU Nonmachinable	Intra-BMC nmo	(\$4.897)	5e
RDU Oversize	Intra-BMC over	(\$11.970)	5f

#### Sources

- [1]. Modeled costs from Attachment C, pages 7-15.  
 [2]. Docket No. R2005-1, USPS-LR-K-46  
 [3]. Docket No. R2005-1, USPS-LR-K-46  
 [4]. [1] \* [2] + [3].  
 [5]. Difference between Cost Category and Benchmark.  
 [5a]: (4a)-(4d).  
 [5b]: (4b)-(4e)  
 [5c]: (4c)-(4f).  
 [5d]: (4a)-(4g)  
 [5e]: (4b)-(4h).  
 [5f]: (4c)-(4i).

## Productivities and Variabilities for Direct Labor Operations

	<b>Productivities</b> <b>(Units per Wkhr)</b>	
<b>UNLOADING</b>		
Unload sacked machinable parcels to extended conveyor	213.2	1/
Unload machinable parcels to extended conveyor	709.8	1/
Unload non-machinable parcels	183.9	1/
Unload non-machinable parcels to IHC only (proxy for sacks)	175.6	1/
Unload wheeled containers	23.7	1/
Unload Pallets/Postal Paks/Pallet Box	14.0	1/
<b>DUMPING &amp; SACK HANDLING</b>		
Dump Containers	7.6	1/
Sack shake out	85.4	1/
Manually dump sacks at Non-BMC	119.8	2/
Sack sorter (PIRS 98)	419.7	3/
<b>PARCEL SORTING MACHINE DISTRIBUTION</b>		
PPSM	897.4	3/
SPSM	2005.2	3/
SPSM (Before the SSIU)	1474.7	4/
100 percent Key Rate	971.1	5/
<b>NONMACHINABLE OUTSIDES DISTRIBUTION</b>		
NMO Distribution	82.7	3/
NMO Distribution at SCFs	452.6	6/
Parcel Sort at AO	521.7	8/
<b>OTHER OPERATIONS</b>		
Tend container loader/sweep runouts	6.4	1/
Crossdock containers	8.0	1/
Sack and Tie	148.1	1/
<b>LOADING</b>		
Bedload NMOs to van from IHCs (proxy for machinables)	201.3	1/
Bedload Sacked Machinables	208.1	1/
Load wheeled containers	11.9	1/
Load Pallets/Postal Paks/Pallet Boxes	15.3	1/
<b>Variabilities</b>		
BMC Platform	0.83	7/
BMC Other	0.83	7/
PSM	0.83	7/
SSM	0.83	7/
SPBS	0.83	7/
NMO Distribution at BMCs	0.83	7/
Platform Non-BMC	0.83	7/
NMO Distribution at Non-BMCs	0.78	7/
LDC43	0.83	7/

### Sources

- 1/: Docket No. R97-1, LR-H-132, page 329.
- 2/: Proxy based on Planning Guidelines (PGLs).
- 3/: GFY 2003 PIMS
- 4/: National Database, PIRS average 1995 - 2000.
- 5/: National Database, PIRS FY93, (pure keying, no prebarcode).
- 6/: Docket No. R2005-1, USPS-LR-K-56
- 7/: Docket No. R2005-1, USPS-T-11, Table 1
- 8/: Docket No. R2001-1, LR-J-64, Attachment D, page 2 (sorting 5-digit to carrier-route).

**Arrival and Dispatch Profiles**

	<u>Arrival and Dispatch Percentages</u>	
<b>Mail Flow Arrival Profile at Originating BMCs</b>		
Machinable Parcels Arriving in Bedloaded Sacks at BMC	4.3%	1/
Machinable Parcels Arriving Bedloaded at BMC	7.0%	1/
Machinable Parcels Arriving sacked in OTRs at BMC	11.5%	1/
Machinable Parcels Arriving loose in OTRs at BMC	51.1%	1/
Machinable Parcels Arriving Palletized at BMC	1.6%	1/
Machinable Parcels Arriving in Pallet Boxes at BMC	0.9%	1/
Machinable Parcels Arriving in Hampers/APC/OWC (OWC) at BMC	23.6%	1/
Non-Machinable Parcels Arriving Bedloaded at BMC	4.0%	1/
Non-Machinable Parcels Arriving Palletized at BMC	1.3%	1/
Non-Machinable Parcels Arriving in OTR Containers at BMC	72.5%	1/
Non-Machinable Parcels Arriving in Hampers/APC/OWC (OWC) at BMC	22.2%	1/
<b>Mail Flow Arrival Profile from Origin BMCs to Destination BMCs</b>		
Machinable Parcels Arriving in Postal Paks at Destination BMC (from Origin BMC)	100.0%	2/
NMOs Arriving Palletized at Destination BMC (from Origin BMC)	100.0%	2/
<b>Mail Flow Arrival at Destinating BMCs for DBMC parcels</b>		
Machinable Parcel Arriving Bedloaded at DBMC	96.2%	3/
Machinable Parcels Arriving on Pallets at DBMC	0.3%	3/
Machinable Parcels Arriving in OTRs at BMC	0.8%	3/
Machinable Parcels Arriving in Gaylords at DBMC	2.6%	3/
Machinable Parcels arriving in OWC at DBMC	0.1%	3/
Non-Machinable Parcels Arriving Bedloaded at DBMCs	98.5%	3/
Non-Machinable Parcels Arriving in Pallet Boxes at DBMC	0.7%	3/
Non-Machinable Parcels Arriving on Pallets at DBMC	0.8%	3/
<b>Mail Flow Dispatch Profiles From BMCs to Service Area</b>		
Machinable Parcels Dispatched in Bedloaded Sacks to Service Area	23.8%	4/
Machinable Parcels Dispatched loose in OTRs to Service Area	60.3%	4/
Machinable Parcels Dispatched sacked in OTRs to Service Area	2.9%	4/
Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Service Area	13.0%	4/
Non-Machinable Parcels Dispatched Bedloaded to Service Area	12.9%	5/
Non-Machinable Parcels Dispatched on Pallets to Service Area	31.0%	5/
Non-Machinable Parcels Dispatched in OTRs to Service Area	53.6%	5/
Non-Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Service Area	2.5%	5/
<b>Mail Flow Dispatch Profiles to Delivery Unit</b>		
Machinable Parcels Dispatched in Bedloaded Sacks of Delivery Unit	26.7%	6/
Machinable Parcels Dispatched loose in OTRs to Service Area to Delivery Unit	60.3%	6/
Machinable Parcels Dispatched in OWC to Delivery Unit	13.0%	6/
Non-Machinable Parcels Dispatched Bedloaded to Delivery Unit	26.7%	7/
Non-Machinable Parcels Dispatched in OTRs to Delivery Unit	60.3%	7/
Non-Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Delivery Unit	13.0%	7/

**Sources**

- 1/ Docket No. R97-1 USPS LR-H-131, Table 1. Assume 61.6 of bedloaded is loose and 38.4 is sacked.  
Assume 81.6 percent of mail in OTRs is loose and 18.4 percent is sacked (Docket No. R97-1, LR-H-132, page 277).
- 2/ Assumptions that 100 percent of parcels going from BMC to BMC will be in Postal Paks.
- 3/ Unload Profile and # of handlings are from Docket No. R97-1 USPS LR-H-131, Table 2.
- 4/ Docket No. R97-1 USPS LR-H-132, Attachment 1, page 274.
- 5/ Docket No. R97-1 USPS LR-H-132, Attachment 3, page 278.
- 6/ Assume same as dispatch profile as BMC, but sacks in OTRs get bedloaded.
- 7/ Use Dispatch profile of machinables as a proxy, use bedloaded sacks for bedloaded NMOs.

**Piggyback Factors, Wages, Mail Flow Operating Assumptions**

<b>Wage Rate with Premium Pay Factor Applied</b>	<b>\$35.371</b>	<b>1/</b>
<b>Premium Pay Factor</b>	<b>0.989</b>	<b>2/</b>
<b>TY Other mail processing wage rate</b>	<b>\$35.772</b>	<b>3/</b>
<b>Window Service Adjustment Factor</b>	<b>1.075</b>	<b>4/</b>
Window Service Base year wage rate	33.804	5/
Window Service Test year wage rate	36.344	6/
<b>Mail Processing Operation Specific Piggyback Factors</b>		
NMO Sorting at BMC	1.571	7/
Other Operations at BMCs	1.545	7/
Platform BMC	1.622	7/
Primary Parcel Sorting Machine	2.145	7/
Secondary Parcel Sorting Machine	5.391	7/
Sack Sorting Machine - BMC	2.159	7/
NMO Sorting at SCF	1.419	7/
Platform Non-BMC	1.458	7/
NonMODS Allied	1.738	7/
NonMODSMANP	1.510	7/
Window Service Piggyback factor (Parcel Post)	1.348	8/
<b>Mail Flow Operating Assumptions</b>		
Percent with direct transportation to destinating delivery unit from BMC	12.3%	9/
Percent Sorted to 5-Digits by Primary Parcel Sorting Machine	20.1%	10/
Destinating BMCs will feed barcoded destinating mail unfiltered to secondary	20.8%	11/
Probability that mail fed directly to nonspecific secondary will receive more than one sort	50.0%	12/
Probability that barcode on secondary will not be readable	3.0%	13/
Proportion of parcel singulators (SSIU) being at secondary	100.0%	14/
Proportion sent from secondary to primary due to SSIU	3.0%	15/
Probability of Inter-BMC parcel going to primary psm at destination BMC	85.7%	16/
Probability of Inter-BMC parcel being handled by SSIU in destination BMC	94.5%	17/
Probability of Intra-BMC and DBMC parcels going to primary psm (or get keyed)	100.00%	18/
Probability of Intra-BMC and DBMC on secondary psm	79.9%	19/
Probability that NMOs will NOT be inducted on the conveyor system (not used for NMOs over 10)	41.2%	20/
Probability that NMOs will be NOT be moved using towveyor (not used for pallets)	31.4%	20/
Probability that PRS machinable mail pieces are processed on the PPSM	97.4%	21/
Probability that PRS machinable mail pieces are processed on the SPSM	24.8%	21/

**Sources**

- 1/: (2) x (3).
- 2/: Docket No. R2005-1, USPS-LR-K-55
- 3/: Docket No. R2005-1, USPS-LR-K-55
- 4/: (6) / (5).
- 5/: Docket No. R2005-1, USPS-LR-K-55
- 6/: Docket No. R2005-1, USPS-LR-K-55
- 7/: Docket No. R2005-1, USPS-LR-K-52
- 8/: Docket No. R2005-1, USPS-LR-K-52
- 9/: USPS LR-PCR-40, page 64.
- 10/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [10].
- 11/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [9].
- 12/: Assumption that mail going to secondary PSM will be evenly split between scheme 1 and scheme 2.
- 13/: Assumption used by Operations.
- 14/: Assumption used by Operations.
- 15/: (14) x (15).
- 16/:  $[1 - (12)] + [(16) \times (12)] + [(1) - (12)] \times [(1) - (11)] \times (16) + [(11) \times (12) \times (1) - (16)]$ .
- 17/:  $(12) + [(11) \times (13)] + [1 - (12)] \times [(1) - (11)]$ .
- 18/:  $1 + [1 - (11)] \times (16)$ .
- 19/:  $1 - (11)$ .
- 20/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [11].

## Other Inputs

### FY 2004 Volumes

	Percents		machinable [3]	NMO		Total [6]
	% mach [1]	% over [2]		(non oversize) [4]	Oversize [5]	
Inter-BMC	94.5%	0.063%	73,627,919	4,217,546	48,858	77,894,322
Intra-BMC	94.3%	0.099%	29,007,959	1,710,042	30,331	30,748,332
DBMC	93.4%	0.094%	81,164,769	5,617,204	81,739	86,863,713
DSCF	93.4%	0.094%	2,787,960	192,948	2,808	2,983,715
DDU	93.4%	0.094%	<u>160,094,387</u>	<u>11,079,720</u>	<u>161,227</u>	<u>171,335,334</u>
Total			346,682,994	22,817,459	324,963	369,825,416

### Calculation of Percent of Inter and Intra entered at origin AO

Percent of inter-BMC that is retail	25.6%	1/
Percent of intra-BMC that is retail	38.5%	2/

### Average Cubic Feet of Parcel Post

	[7]
Machinable	0.425
Non-machinable	2.777
Oversize	7.938

### Sources

Rows (1&2): Docket R2001-1, LR-J-64, Attachment A, page 6.

Column [1]: Docket R2001-1, LR-J-67, Attachment A, page 6. Machinable volume / total volume.

Column [2]: Docket R2001-1, LR-J-67, Attachment A, page 6. Nonmachinable volume / total nonmachinable volume.

Column [3]: Column [1] \* column [6].

Column [4]: Column [6] - column [3] - column [5].

Column [5]: Column [2] \* column [6].

Column [6]: GFY2004 RPW volumes.

Column [7]: Docket No. R2005-1, USPS-LR-K-47

Conversion Factor Calculations

Container Type	Outside Dim. Per Container (Inches) [1]	Inside Dim. Per Container (Inches) [2]	Cubic Feet Per Container [3]	Effective Parcel Capacity (# of Parcels) [4]	Capacity at Average Fullness (# of Parcels) [5]	Average % FULL [6]
<b>Machinable</b>						
Pallet	48x40x48	48x40x48	53.3	125.6	106.8	85%
Postal Pak	48x40x69	46.5x38.5x69	71.5	153.1	130.1	85%
Pallet Box	48x40x69	46.5x38.5x69	71.5	153.1	134.7	88%
Pallet Box (for space)	48x40x70	46.5x38.5x70	71.5	153.1	114.8	75%
Sacks on In-house Container	65x41.5x36	65x41.5x36	56.2	120.3	102.3	85%
<b>NMOs</b>						
Pallet	48x40x48	48x40x48	53.3	19.2	19.2	100%
Pallet Box	48x40x69	46.5x38.5x69	71.5	23.4	19.9	85%
In-house Container	65x41.5x36	65x41.5x36	56.2	18.4	15.6	85%
<b>Oversize NMOs</b>						
108"-130" on Pallet	48x40x48	48x40x48	53.3	6.7	6.7	100%
108"-130" in IHC	65x41.5x36	65x41.5x36	56.2	6.4	6.4	100%

Pieces Per Container	Machinable		Nonmachinable		108"-130"
	R2000-1 (FY98) [7]	R2005-1 (FY04) [8]	R2000-1 (FY98) [9]	R2005-1 (FY04) [10]	R2005-1 (FY04) [11]
Sack	5.1	7.0	n/a	n/a	n/a
Sack in OTR	81.8	112.0	n/a	n/a	n/a
OTR	69.0	94.5	27.1	19.5	6.8
APC	35.7	48.8	14.0	10.1	3.5
Hamper	23.0	31.5	9.0	6.5	2.3

	Cubic Feet Per Parcel Post			No. of Sacks	No. of Sacks
	Machinable [12]	NMO [13]	108"-130" [14]	on IHC [15]	on Postal Pak [16]
R2005-1 (BY04)	0.425	2.777	7.94	14.61	18.59
R2000 (BY98)	0.581	1.992			

Sources

- Columns [1 & 2] Container Methods Handbook PO-502 (September 1992), USPS LR-H-133
- Column [3] (Length \* width \* height) / (12\*12\*12)
- Column [4] ((Column [3]) / ((column [13]) \* air factor), to account for "effective cube" and (column [3]) / ((column [14]) \* air factor) and (column [3]) / ((column [16]) \* air factor).  
Air factor = 1 for pallets, and 1.1 for all else
- Column [5] Effective cubic capacity (column [4]) \* average % fullness (column [6])
- Column [6] Pallets, postal paks and IHCs should be as full as practicable before dispatch so it is reasonable to assume these containers will be at least 85% full.  
The majority of pallet boxes come from mailers who must have 75 percent full boxes, and tend to fill them to maximize capacity.  
Therefore 88 percent, the average of 75 and 100 percent was used.
- Column [7] Docket No. R84-1, Exhibit USPS-141
- Column [8] Pieces per container in Docket No. R84-1 (column [7]) \* FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [9] Docket No. R84-1, Exhibit USPS-141
- Column [10] Pieces per container in Docket No. R84-1 (column [9]) \* FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [11] Column [10] \* column [13] / column [15]
- Column [12] Attachment C, page 5, column [7], machinable parcels.
- Column [13] Attachment C, page 5, column [7], non-machinable parcels
- Column [14] Attachment C, page 5, column [7], oversize parcels
- Column [15] No. of parcels on IHC (column 5) divided by no. of parcels in a sack (column 8)
- Column [16] No. of parcels on a parcel (column 5) divided by no. of parcels in a sack (column 8)

## Intra-BMC Machinable Mail Processing Cost Model

	[1]	[2]	[3]	[4]	[5]	[6]
	# handlings	units/hr	conversion	piggyback	\$ per oper.	\$ per facility
Origin AO <sup>1</sup>						\$0.068
Move Containers to Dock	0.3849	32.1	40.1	1.738	\$0.048	\$0.018
Load Containers	0.3849	11.9	40.1	1.738	\$0.129	\$0.050
Origin SCF						\$0.303
Unload Containers <sup>2</sup>	1.0000				\$0.038	\$0.038
Crossdock containers	1.0000	8.0	40.1	1.738	\$0.191	\$0.191
Bedload Sacks	0.0434	208.1	7.0	1.458	\$0.035	\$0.002
Bedload loose	0.0696	201.3	1.0	1.458	\$0.256	\$0.018
Load Sacks in OTRs	0.1152	11.9	112.0	1.458	\$0.039	\$0.004
Load Loose in OTRs	0.5108	11.9	94.5	1.458	\$0.046	\$0.023
Load Pallets	0.0160	15.3	106.8	1.458	\$0.032	\$0.001
Load Pallet Boxes	0.0090	15.3	134.7	1.458	\$0.025	\$0.000
Load OWCs	0.2360	11.9	40.1	1.458	\$0.108	\$0.026
Destination BMC						\$0.529
Unload Bedload Sack	0.0434	213.2	7.0	1.622	\$0.038	\$0.002
Unload Bedload Loose	0.0696	709.8	1.0	1.622	\$0.081	\$0.006
Unload Sacks in OTR	0.1152	23.7	112.0	1.622	\$0.022	\$0.002
Unload loose in OTR	0.5108	23.7	94.5	1.622	\$0.026	\$0.013
Unload Pallet	0.0160	14.0	106.8	1.622	\$0.038	\$0.001
Unload Pallet Boxes	0.0090	14.0	134.7	1.622	\$0.030	\$0.000
Unload Other Wheeled Cont.	0.2360	23.7	40.1	1.622	\$0.060	\$0.014
Dump OTR of sacks	0.1152	7.6	112.0	1.545	\$0.064	\$0.007
Dump OTR of loose	0.5108	7.6	94.5	1.545	\$0.076	\$0.039
Dump Pallet	0.0160	7.6	106.8	1.545	\$0.067	\$0.001
Dump Pallet Boxes	0.0090	7.6	134.7	1.545	\$0.053	\$0.000
Dump Other Wheeled Cont	0.2360	7.6	40.1	1.545	\$0.179	\$0.042
Sack Sorter	0.1586	419.7	7.0	2.159	\$0.026	\$0.004
Sack shakeout	0.1586	85.4	7.0	1.545	\$0.091	\$0.015
PPSM	1.0000	897.4	1.0	2.145	\$0.085	\$0.085
SPSM	0.7991	2005.2	1.0	5.391	\$0.095	\$0.076
Sweep Runouts OTR	0.7327	6.4	94.5	1.545	\$0.090	\$0.066
Sack and Tie	0.2673	148.1	1.0	1.545	\$0.369	\$0.099
Bedload Sacks	0.2384	208.1	7.0	1.622	\$0.039	\$0.009
Load OTRs w/ sacks	0.0289	11.9	112.0	1.622	\$0.043	\$0.001
Load OTRs w/ loose	0.6025	11.9	94.5	1.622	\$0.051	\$0.031
Load Hampers/OWC	0.1302	11.9	40.1	1.622	\$0.121	\$0.016
Destination SCF						\$0.141
Unload Bedload Sacks	0.2091	175.6	7.0	1.458	\$0.042	\$0.009
Unload Sacks in OTR	0.0253	23.7	112.0	1.458	\$0.019	\$0.000
Unload loose in OTR	0.5284	23.7	94.5	1.458	\$0.023	\$0.012
Unload OWC	0.1142	23.7	40.1	1.458	\$0.054	\$0.006
Crossdock IHC (Bedload Sack)	0.2091	8.0	102.3	1.458	\$0.063	\$0.013
Crossdock Sacks in OTR	0.0253	8.0	112.0	1.458	\$0.057	\$0.001
Crossdock loose in OTR	0.5284	8.0	94.5	1.458	\$0.068	\$0.036
Crossdock OWC	0.1142	8.0	40.1	1.458	\$0.160	\$0.018
Bedload Sacks	0.2344	208.1	7.0	1.458	\$0.035	\$0.008
Load OTRs w/ loose	0.5284	11.9	94.5	1.458	\$0.046	\$0.024
Load Hampers/OWC	0.1142	11.9	40.1	1.458	\$0.108	\$0.012
Destination Delivery Unit						\$0.181
Unload Bedload Sacks	0.2673	175.6	7.0	1.458	\$0.042	\$0.011
Unload loose in OTR	0.6025	23.7	94.5	1.458	\$0.023	\$0.014
Unload OWC	0.1302	23.7	40.1	1.458	\$0.054	\$0.007
Dump Sacks	0.2673	119.8	7.0	1.458	\$0.062	\$0.016
Move Containers from Dock	1.0000	32.1	64.0	1.738	\$0.030	\$0.030
Sort Parcels	1.0000	521.7	1.0	1.510	\$0.102	\$0.102
<b>Model Cost</b>						<b>\$1.222</b>

Sources

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5.<sup>2</sup> Unload Containers cost at ODCF uses the average cost of unloading containers at origin BMC as proxy.

## Intra-BMC Non-machinable Mail Processing Cost Model

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.330</b>
Move Containers to Dock	0.3849	32.1	8.3	1.738	\$0.232	\$0.089
Load Containers	0.3849	11.9	8.3	1.738	\$0.627	\$0.241
<b>Origin SCF</b>						<b>\$1.388</b>
Unload Containers <sup>2</sup>	1.0000				\$0.170	\$0.170
Crossdock containers	1.0000	8.0	8.3	1.738	\$0.927	\$0.927
Bedload NMOs	0.0400	201.3	1.0	1.458	\$0.256	\$0.010
Load NMOs in OTRs	0.7250	11.9	19.5	1.458	\$0.223	\$0.162
Load NMOs in OWCs	0.2220	11.9	8.3	1.458	\$0.526	\$0.117
Load NMOs on Pallets	0.0130	15.3	19.2	1.458	\$0.176	\$0.002
<b>Destination BMC</b>						<b>\$1.277</b>
Unload Bedloaded NMOs	0.0400	183.9	1.0	1.622	\$0.312	\$0.012
Unload NMOs in OTRs	0.7250	23.7	19.5	1.622	\$0.124	\$0.090
Unload NMOs in OWC	0.2220	23.7	8.3	1.622	\$0.292	\$0.065
Unload NMOs on Pallets	0.0130	14.0	19.2	1.622	\$0.214	\$0.003
Move IHCs (from bedload)	0.0165	16.0	15.6	1.545	\$0.218	\$0.004
Move OTRs	0.2988	16.0	19.5	1.545	\$0.175	\$0.052
Move OWC	0.0915	16.0	8.3	1.545	\$0.412	\$0.038
Move Pallets	0.0054	16.0	19.2	1.545	\$0.177	\$0.001
D. Primary NMO Sort	1.0000	82.7	1.0	1.571	\$0.672	\$0.672
Move IHCs	0.0405	16.0	18.4	1.545	\$0.185	\$0.007
Move OTRs	0.1681	16.0	19.5	1.545	\$0.175	\$0.029
Move OWC	0.0078	16.0	8.3	1.545	\$0.412	\$0.003
Move Pallets	0.3098	16.0	19.2	1.545	\$0.177	\$0.055
Bedload from IHC	0.1291	201.3	1.0	1.622	\$0.285	\$0.037
Load NMOs in OTRs	0.5363	11.9	19.5	1.622	\$0.249	\$0.133
Load NMOs in OWC	0.0248	11.9	8.3	1.622	\$0.585	\$0.015
Load NMOs on Pallet	0.3098	15.3	19.2	1.622	\$0.196	\$0.061
<b>Destination SCF</b>						<b>\$0.928</b>
Unload Bedload to IHC	0.1291	175.6	1.0	1.458	\$0.294	\$0.038
Unload OTRs	0.5363	23.7	19.5	1.458	\$0.112	\$0.060
Unload OWC	0.0248	23.7	8.3	1.458	\$0.263	\$0.007
Unload Pallet	0.3098	14.0	19.2	1.458	\$0.192	\$0.059
Move IHC	0.1291	16.0	15.6	1.458	\$0.205	\$0.027
Move OTRs	0.5363	16.0	19.5	1.458	\$0.165	\$0.089
Move OWC	0.0248	16.0	8.3	1.458	\$0.389	\$0.010
Move Pallet	0.3098	16.0	19.2	1.458	\$0.167	\$0.052
Manual Sort	1.0000	452.6	1.0	1.419	\$0.111	\$0.111
Move IHC	0.2673	16.0	15.6	1.458	\$0.205	\$0.055
Move OTRs	0.6025	16.0	19.5	1.458	\$0.165	\$0.100
Move OWC	0.1302	16.0	8.3	1.458	\$0.389	\$0.051
Bedload NMOs	0.2673	201.3	1.0	1.458	\$0.256	\$0.068
Load OTRs w/ loose	0.6025	11.9	19.5	1.458	\$0.223	\$0.135
Load Hampers/OWC	0.1302	11.9	8.3	1.458	\$0.526	\$0.068
<b>Destination Delivery Unit</b>						<b>\$0.429</b>
Unload Bedload NMOs	0.2673	175.6	1.0	1.458	\$0.294	\$0.078
Unload loose in OTR	0.6025	23.7	19.5	1.458	\$0.112	\$0.067
Unload OWC	0.1302	23.7	8.3	1.458	\$0.263	\$0.034
Move Containers from Dock	1.0000	32.1	13.1	1.738	\$0.147	\$0.147
Sort Parcels	1.0000	521.7	1.0	1.510	\$0.102	\$0.102

<b>Model Cost</b>	<b>\$4.353</b>
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Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5.

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**Intra-BMC Non-machinable Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.944</b>
Move Containers to Dock	0.3849	32.1	2.9	1.738	\$0.662	\$0.255
Load Containers	0.3849	11.9	2.9	1.738	\$1.791	\$0.689
<b>Origin SCF</b>						<b>\$3.926</b>
Unload Containers <sup>2</sup>	1.0000				\$0.464	\$0.464
Crossdock containers	1.0000	8.0	2.9	1.738	\$2.650	\$2.650
Bedload NMOs	0.0400	201.3	1.0	1.458	\$0.256	\$0.010
Load NMOs in OTRs	0.7250	11.9	6.8	1.458	\$0.638	\$0.463
Load NMOs in OWCs	0.2220	11.9	2.9	1.458	\$1.502	\$0.333
Load NMOs on Pallets	0.0130	15.3	6.7	1.458	\$0.503	\$0.007
<b>Destination BMC</b>						<b>\$2.629</b>
Unload Bedloaded to IHC	0.0400	175.6	1.0	1.622	\$0.327	\$0.013
Unload NMOs in OTRs	0.7250	23.7	6.8	1.622	\$0.355	\$0.257
Unload NMOs in OWC	0.2220	23.7	2.9	1.622	\$0.836	\$0.185
Unload NMOs on Pallets	0.0130	14.0	6.7	1.622	\$0.611	\$0.008
Move IHC	0.0400	16.0	6.4	1.545	\$0.529	\$0.021
Move OTR	0.7250	16.0	6.8	1.545	\$0.500	\$0.363
Move OWC	0.2220	16.0	2.9	1.545	\$1.178	\$0.261
Move Pallet	0.0130	16.0	6.7	1.545	\$0.507	\$0.007
D Primary NMO Sort	1.0000	82.7	1.0	1.571	\$0.672	\$0.672
Move IHC	0.0125	16.0	6.4	1.545	\$0.529	\$0.007
Move OTR	0.2273	16.0	6.8	1.545	\$0.500	\$0.114
Move OWC	0.0696	16.0	2.9	1.545	\$1.178	\$0.082
Move Pallet	0.0130	16.0	6.7	1.545	\$0.507	\$0.007
Bedload from IHC	0.1291	201.3	1.0	1.622	\$0.285	\$0.037
Load NMOs in OTRs	0.5363	11.9	6.8	1.622	\$0.711	\$0.381
Load NMOs on Pallet	0.3098	15.3	6.7	1.622	\$0.559	\$0.173
Load NMOs in OWC	0.0248	11.9	2.9	1.622	\$1.672	\$0.041
<b>Destination SCF</b>						<b>\$2.213</b>
Unload Bedload to IHC	0.1291	175.6	1.0	1.458	\$0.294	\$0.038
Unload OTRs	0.5363	23.7	6.8	1.458	\$0.319	\$0.171
Unload Pallet	0.3098	14.0	6.7	1.458	\$0.549	\$0.170
Unload OWC	0.0248	23.7	2.9	1.458	\$0.751	\$0.019
Move IHC	0.1291	16.0	6.4	1.458	\$0.499	\$0.064
Move OTRs	0.5363	16.0	6.8	1.458	\$0.472	\$0.253
Move Pallet	0.3098	16.0	6.7	1.458	\$0.478	\$0.148
Move OWC	0.0248	16.0	2.9	1.458	\$1.111	\$0.028
Manual Sort	1.0000	452.6	1.0	1.419	\$0.111	\$0.111
Move IHC	0.2673	16.0	6.4	1.458	\$0.499	\$0.133
Move OTRs	0.6025	16.0	6.8	1.458	\$0.472	\$0.284
Move OWC	0.1302	16.0	2.9	1.458	\$1.111	\$0.145
Bedload NMOs	0.2673	201.3	1.0	1.458	\$0.256	\$0.068
Load OTRs w/ loose	0.6025	11.9	6.8	1.458	\$0.638	\$0.385
Load Hampers/OWC	0.1302	11.9	2.9	1.458	\$1.502	\$0.196
<b>Destination Delivery Unit</b>						<b>\$0.875</b>
Unload Bedload NMOs	0.2673	175.6	1.0	1.458	\$0.294	\$0.078
Unload loose in OTR	0.6025	23.7	6.8	1.458	\$0.319	\$0.192
Unload OWC	0.1302	23.7	2.9	1.458	\$0.751	\$0.098
Move Containers from Dock	1.0000	32.1	4.7	1.738	\$0.404	\$0.404
Sort Parcels	1.0000	521.7	1.0	1.510	\$0.102	\$0.102

**Model Cost** **\$10.588**

**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).  
 Column [2]: Attachment C, page 2 (units per workhour).  
 Column [3]: Attachment C, page 6 (conversion factors).  
 Column [4]: Attachment C, page 4 (piggyback factors).  
 Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
 Column [6]: (column [1] \* column [5]).

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5.

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**RBMC Machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.177</b>
Move Containers to Dock	1.0000	32.1	40.1	1.738	\$0.048	\$0.048
Load Containers	1.0000	11.9	40.1	1.738	\$0.129	\$0.129
<b>Origin SCF</b>						<b>\$0.303</b>
Unload Containers <sup>2</sup>	1.0000				\$0.038	\$0.038
Crossdock containers	1.0000	8.0	40.1	1.738	\$0.191	\$0.191
Bedload Sacks	0.0434	208.1	7.0	1.458	\$0.035	\$0.002
Bedload loose	0.0696	201.3	1	1.458	\$0.256	\$0.018
Load Sacks in OTRs	0.1152	11.9	112.0	1.458	\$0.039	\$0.004
Load Loose in OTRs	0.5108	11.9	94.5	1.458	\$0.046	\$0.023
Load Pallets	0.0160	15.3	106.8	1.458	\$0.032	\$0.001
Load Pallet Boxes	0.0090	15.3	134.7	1.458	\$0.025	\$0.000
Load OWCs	0.2360	11.9	40.1	1.458	\$0.108	\$0.026
<b>Destination BMC</b>						<b>\$0.306</b>
Unload Bedload Sack	0.0434	213.2	7.0	1.622	\$0.038	\$0.002
Unload Bedload Loose	0.0696	709.8	1.0	1.622	\$0.081	\$0.006
Unload Sacks in OTR	0.1152	23.7	112.0	1.622	\$0.022	\$0.002
Unload loose in OTR	0.5108	23.7	94.5	1.622	\$0.026	\$0.013
Unload Pallet	0.0160	14.0	106.8	1.622	\$0.038	\$0.001
Unload Pallet Boxes	0.0090	14.0	134.7	1.622	\$0.030	\$0.000
Unload Other Wheeled Cont.	0.2360	23.7	40.1	1.622	\$0.060	\$0.014
Dump OTR of sacks	0.1152	7.6	112.0	1.545	\$0.064	\$0.007
Dump OTR of loose	0.5108	7.6	94.5	1.545	\$0.076	\$0.039
Dump Pallet	0.0160	7.6	106.8	1.545	\$0.067	\$0.001
Dump Pallet Boxes	0.0090	7.6	134.7	1.545	\$0.053	\$0.000
Dump Other Wheeled Cont.	0.2360	7.6	40.1	1.545	\$0.179	\$0.042
Sack Sorter	0.1586	419.7	7.0	2.159	\$0.026	\$0.004
Sack shakeout	0.1586	85.4	7.0	1.545	\$0.091	\$0.015
PPSM	0.9736	897.4	1.0	2.145	\$0.085	\$0.082
SPSM	0.2482	2005.2	1.0	5.391	\$0.095	\$0.024
Move Pallets	1.0000	16.0	134.7	1.545	\$0.025	\$0.025
Load Pallet Boxes	1.0000	15.3	134.7	1.622	\$0.028	\$0.028

<b>Model Cost</b>	<b>\$0.785</b>
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**Sources**

- Column [1]: Attachment C, page 3 (arrival and dispatch profiles).  
Column [2]: Attachment C, page 2 (units per workhour).  
Column [3]: Attachment C, page 6 (conversion factors).  
Column [4]: Attachment C, page 4 (piggyback factors).  
Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
Column [6]: (column [1] \* column [5]).

<sup>1</sup>Assumption that all RBMC will be entered at origin AO.

<sup>2</sup>Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**RBMC Non-machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.859</b>
Move Containers to Dock	1.0000	32.1	8.3	1.738	\$0.232	\$0.232
Load Containers	1.0000	11.9	8.3	1.738	\$0.627	\$0.627
<b>Origin SCF</b>						<b>\$1.388</b>
Unload Containers <sup>2</sup>	1.0000				\$0.170	\$0.170
Crossdock containers	1.0000	8.0	8.3	1.738	\$0.927	\$0.927
Bedload NMOs	0.0400	201.3	1.0	1.458	\$0.256	\$0.010
Load NMOs in OTRs	0.7250	11.9	19.5	1.458	\$0.223	\$0.162
Load NMOs in OWCs	0.2220	11.9	8.3	1.458	\$0.526	\$0.117
Load NMOs on Pallets	0.0130	15.3	19.2	1.458	\$0.176	\$0.002
<b>Destination BMC</b>						<b>\$1.175</b>
Unload Bedloaded NMOs	0.0400	183.9	1.0	1.622	\$0.312	\$0.012
Unload NMOs in OTRs	0.7250	23.7	19.5	1.622	\$0.124	\$0.090
Unload NMOs in OWC	0.2220	23.7	8.3	1.622	\$0.292	\$0.065
Unload NMOs on Pallets	0.0130	14.0	19.2	1.622	\$0.214	\$0.003
Move IHCs (from bedload)	0.0165	16.0	15.6	1.545	\$0.218	\$0.004
Move OTRs	0.2988	16.0	19.5	1.545	\$0.175	\$0.052
Move OWC	0.0915	16.0	8.3	1.545	\$0.412	\$0.038
Move Pallets	0.0054	16.0	19.2	1.545	\$0.177	\$0.001
D. Primary NMO Sort	1.0000	82.7	1.0	1.571	\$0.672	\$0.672
Move Pallets	1.0000	16.0	19.2	1.545	\$0.177	\$0.177
Load NMOs on Pallet	0.3098	15.3	19.2	1.622	\$0.196	\$0.061

<b>Model Cost</b>	<b>\$3.422</b>
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**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup>Assumption that all RBMC will be entered at origin AO.

<sup>2</sup>Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**RBMC Non-machinable Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$2.454</b>
Move Containers to Dock	1.0000	32.1	2.9	1.738	\$0.662	\$0.662
Load Containers	1.0000	11.9	2.9	1.738	\$1.791	\$1.791
<b>Origin SCF</b>						<b>\$3.926</b>
Unload Containers <sup>2</sup>	1.0000				\$0.464	\$0.464
Crossdock containers	1.0000	8.0	2.9	1.738	\$2.650	\$2.650
Bedload NMOs	0.0400	201.3	1.0	1.458	\$0.256	\$0.010
Load NMOs in OTRs	0.7250	11.9	6.8	1.458	\$0.638	\$0.463
Load NMOs in OWCs	0.2220	11.9	2.9	1.458	\$1.502	\$0.333
Load NMOs on Pallets	0.0130	15.3	6.7	1.458	\$0.503	\$0.007
<b>Destination BMC</b>						<b>\$2.683</b>
Unload Bedloaded to IHC	0.0400	175.6	1.0	1.622	\$0.327	\$0.013
Unload NMOs in OTRs	0.7250	23.7	6.8	1.622	\$0.355	\$0.257
Unload NMOs in OWC	0.2220	23.7	2.9	1.622	\$0.836	\$0.185
Unload NMOs on Pallets	0.0130	14.0	6.7	1.622	\$0.611	\$0.008
Move IHC	0.0400	16.0	6.4	1.545	\$0.529	\$0.021
Move OTR	0.7250	16.0	6.8	1.545	\$0.500	\$0.363
Move OWC	0.2220	16.0	2.9	1.545	\$1.178	\$0.261
Move Pallet	0.0130	16.0	6.7	1.545	\$0.507	\$0.007
D. Primary NMO Sort	1.0000	82.7	1.0	1.571	\$0.672	\$0.672
Move Pallet	1.0000	16.0	8.0	1.545	\$0.426	\$0.426
Load NMOs on Pallet	1.0000	15.3	8.0	1.622	\$0.470	\$0.470
<b>Model Cost</b>						<b>\$9.064</b>

**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup>Assumption that all RBMC will be entered at origin AO.

<sup>2</sup>Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.





**RDU Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO</b>						<b>\$0.765</b>
Sort by Shipper ID	1.0000	521.7	1.0	1.510	\$0.102	\$0.102
Move Containers to Dock	1.0000	32.1	2.9	1.738	\$0.662	\$0.662
Load Containers	0.0000	11.9	2.9	1.738	\$1.791	\$0.000
<b>Model Cost</b>						<b>\$0.765</b>

**Sources**

- Column [1]: All RDU parcels will be sorted to shipper and moved to dock (USPS-T-1, Section VII).  
Column [2]: Attachment C, page 2 (units per workhour).  
Column [3]: Attachment C, page 6 (conversion factors).  
Column [4]: Attachment C, page 4 (piggyback factors).  
Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
Column [6]: (column [1] \* column [5]).

## Storage Cost Estimates

	Mail Category			
	Machinable	Non-Machinable	Oversize	
# of pieces in Container (Pallet Box)	134.7	19.9	6.7	1/
Total Square Feet taken up by one container	13.3	13.3	13.3	2/
Cost of Space (\$/sf) - Annual	\$17.470	\$17.470	\$17.470	3/
Space Variability	1.000	1.000	1.000	4/
Space Support Factor	1.354	1.354	1.354	5/
Cost of Space (\$/sf) - Annual	\$23.660	\$23.660	\$23.660	6/
Cost per square foot - Daily (303 days)	\$0.078	\$0.078	\$0.078	7/
Cost per Container	\$1.041	\$1.041	\$1.041	8/
Cost per piece per day	\$0.008	\$0.052	\$0.155	9/
<b>Storage Days Required</b>				
RBMC	1.834	1.834	1.834	10/
RDU	5.000	5.000	5.000	11/
<b>Cost by PRS Rate Category</b>				
RBMC	\$0.014	\$0.096	\$0.284	12/
RDU	\$0.039	\$0.262	\$0.775	13/

### Sources

- 1/: Attachment C, page 6 (Conversion factors).  
 2/: Calculation using dimensions of containers.  
 3/: Docket No. MC2003-2, USPS-T-2, Attachment D, page 1  
 4/: Variability assumption implicit in data filed in Docket No. R2001-1.  
 5/: Docket No. R94-1, LR-G-120A, Schedule 5, page 1, line 39 and Schedule 4, page 1, line 44.  
 6/: (3) x (4) x (5).  
 7/: (6) / 303 days.  
 8/: (2) x (7).  
 9/: (8) / (1).  
 10/: August 2005 BMC PRS Survey  
 11/: Assumption from Product Definition (mailers must pick up RDU parcels every 5 days).  
 12/: (9) x (10).  
 13/: (9) x (11).

## Transportation Cost Estimate Summary

PRS Rate Category	Benchmark	Total Cost Impact per Cubic Foot [1]	Average Cubic Feet per Piece [2]	Total Cost Impact per Piece [3]
RBMC - Machinable	Intra-BMC	(\$2.212)	0.425	(\$0.939)
RBMC - Non-machinable	Intra-BMC	(\$2.212)	2.777	(\$6.144)
RBMC - Oversize	Intra-BMC	(\$2.212)	7.938	(\$17.560)
RDU - Machinable	Intra-BMC Local	(\$2.442)	0.425	(\$1.037)
RDU - Non-machinable	Intra-BMC Local	(\$2.442)	2.777	(\$6.784)
RDU - Oversize	Intra-BMC Local	(\$2.442)	7.938	(\$19.387)

### Sources

[1]: Attachment E, page 2.

[2]: Attachment C, page 5.

[3]: [1] x [2].

**Transportation Cost Difference Estimates**

**Assumed Legs of Transportation [1]**

		Local	Intermediate	Long Distance
Intra-BMC	[1a]	1.951	1.947	0.000
RBMC	[1b]	1.000	1.000	0.000
RDU	[1c]	0.000	0.000	0.000

**Benchmark Transportation Cost per Cubic Foot [2]**

Zone	Intra-BMC				Total
	Local	Intermediate	Long Distance		
Local	\$1.232	\$1.211	N/A		\$2.442
1-2	\$2.122	\$2.422	N/A		\$4.544
3	\$2.122	\$2.422	N/A		\$4.544
4	\$2.122	\$2.422	N/A		\$4.544
5	\$2.122	\$2.422	N/A		\$4.544
6	N/A	N/A	N/A		N/A
7	N/A	N/A	N/A		N/A
8	N/A	N/A	N/A		N/A

**PRS Transportation Cost per Cubic Foot [3]**

(Benchmark) Zone	RBMC (Intra-BMC)				RDU (Intra-BMC)			
	Local	Intermediate	Long Distance	Total	Local	Intermediate	Long Distance	Total
Local	\$0.631	\$0.622	N/A	\$1.253	\$0.000	\$0.000	N/A	\$0.000
zone 1-2	\$1.088	\$1.244	N/A	\$2.332	\$0.000	\$0.000	N/A	\$0.000
3	\$1.088	\$1.244	N/A	\$2.332	\$0.000	\$0.000	N/A	\$0.000
4	\$1.088	\$1.244	N/A	\$2.332	\$0.000	\$0.000	N/A	\$0.000
5	\$1.088	\$1.244	N/A	\$2.332	\$0.000	\$0.000	N/A	\$0.000
6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**PRS Transportation Cost Impact per Cubic Foot [4]**

(Benchmark) Zone	RBMC (Intra-BMC)				RDU (Intra-BMC)			
	Local	Intermediate	Long Distance	Total	Local	Intermediate	Long Distance	Total
Local	(\$0.600)	(\$0.589)	N/A	(\$1.189)	(\$1.232)	(\$1.211)	N/A	(\$2.442)
1-2	(\$1.035)	(\$1.178)	N/A	(\$2.212)	(\$2.122)	(\$2.422)	N/A	(\$4.544)
3	(\$1.035)	(\$1.178)	N/A	(\$2.212)	(\$2.122)	(\$2.422)	N/A	(\$4.544)
4	(\$1.035)	(\$1.178)	N/A	(\$2.212)	(\$2.122)	(\$2.422)	N/A	(\$4.544)
5	(\$1.035)	(\$1.178)	N/A	(\$2.212)	(\$2.122)	(\$2.422)	N/A	(\$4.544)
6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Sources**

- [1]: Assumed average number of legs of transportation.
  - [1a]: Docket No. R2005-1, USPS LR-K-89, Attachment B, page 9.
  - [1b]: RBMC will travel from origin AO to origin SCF (1 local leg) and from origin SCF to origin BMC (1 intermediate leg).
  - [1b): Since mailers pick up RDU at origin AO, it will not incur any transportation legs.
- [2]: Docket No. R2005-1, USPS LR-K-89, Attachment B, page 11.
- [3]: Ratio of PSRS Rate Category transportation legs (1b&1c) to benchmark [1a] multiplied by benchmark cost [2].
- [4]: PSRS transportation cost per cubic foot [3] minus benchmark transportation cost per cubic foot [2].

### Scanning Cost Estimates

PRS Rate Category	Transaction Time (hours) [1]	Wage Rate [2]	Piggyback Factor [3]	Cost per active scan [4]	Number of active scans [5]	Scan Cost [6]
RBMC - Machinable	0.0007	\$35.371	1.419	\$0.034	0	\$0.000
RBMC - Non-machinable	0.0007	\$35.371	1.419	\$0.034	0	\$0.000
RBMC - Oversize	0.0007	\$35.371	1.419	\$0.034	0	\$0.000
RDU - Machinable	0.0007	\$35.371	1.419	\$0.034	2	\$0.069
RDU - Non-machinable	0.0007	\$35.371	1.419	\$0.034	2	\$0.069
RDU - Oversize	0.0007	\$35.371	1.419	\$0.034	3	\$0.103

#### Sources

- [1]: Docket No. R2000-1, USPS-T-30, Section A, Data Sheet A-8
- [2]: Attachment C, page 4. Premium Pay Adjusted Wage Rate.
- [3]: Docket No. R2005-1, USPS-LR-K-52
- [4]: [1] x [2] x [3]. Follows methodology shown in Docket No. R2001-1 LR-J-135.
- [5]: Assumption taken from USPS product description.
- [6]: [4] x [5].

## Postage Due Cost Estimates

RBMC	Value
Average Time per piece (minutes)	6.018 1/
Average Time per piece (hours)	0.100 2/
Wage Rate	\$35.371 3/
Piggyback Factor	1.330 4/
Postage Due Cost (for sampled parcels)	\$4.717 5/
Sampling Ratio	1.5% 6/
Postage Due Cost (for all parcels)	\$0.070 7/
 RDU	 \$0.000 8/

### Sources

- 1/: Attachment H, page 4, column 7
- 2/: (1) / 60 minutes.
- 3/: Attachment C, page 4
- 4/: Docket No. R2005-1, USPS-LR-K-53, piggyback for mods 18 BUSREPLY cost pool
- 5/: (2) x (3) x (4).
- 6/: Attachment G, page 2
- 7/: (5) x (6).
- 8/: Assumed to be insignificant postage due costs since information from the scanned barcodes will generate a daily postage due manifest.

## Postage Due Sampling Ratio

### USPS Sample Size by Volume Range [1]

Volume		Pieces
Lower Bound	Upper Bound	
1	19	All pieces
20	99	20 % of pieces
100	199	15 % of pieces
200	299	10% of pieces
300	1,999	30 pieces
2,000	3,999	40 pieces
4,000	5,999	50 pieces
6,000	7,999	60 pieces
8,000	9,999	70 pieces
10,000	99,999	100 pieces
100,000	499,999	150 pieces
500,000	up	200 pieces

### Daily Return Volume (5-day week) [2]

BMC	Pieces	Sample Size	Sampling Ratio
	[2]	[3]	[4]
Site A	2,500	40	1.6%
Site B	3,200	40	1.3%
Site C	1,100	30	2.7%
Site D	2,200	40	1.8%
Site E	4,400	50	1.1%
<b>Total</b>	<b>13,400</b>	<b>200</b>	<b>1.5%</b>

**Sources**

- [1]: Supplied by the Business Mailer's Support HQ division.
- [2]: Average returns per BMC per 5-day week.  
Data collected by Marketing for existing customer  
Data was collected in the Fall of 2002.

**Postage Due**

	Location A [1]											
	A	B	C	D	E	F	G	H	I	J	K	
<b>USPS Return Technician</b>												
Pieces	30	30	30	30	30	30	30	30	30	30	30	30
Set Up	25	15	15	15	6	15	15	20	20	20	15	15
Selecting Samples	15	15	50	30	3	7	1	2	2	30	10	10
Weighing / Recording Samples	35	10	15	30	18	60	33	20	67	25	25	25
Matching Worksheet to Manifest	80	120	100	120	-	95	45	25	105	165	55	55
Validating Postage Statement to Manifest												
Transferring Postage Statement to Post Office												
Other (explanation)		135 meeting										
<b>Post Office Tasks</b>												
Permit System Entry of Postage Due	5	5	5	5	15	15	10	-	15	5	5	5
<b>TOTAL</b>												

**Sources**

[1] through [4]: Data collected directly through survey.

[5]: Only includes volume when have entered data.

[6]: Sum of each row.

[7]: [6] / [5].

**Postage Due**

	Location B [2]								
USPS Return Technician	A	B	C	D	E	F	G	H	I
Pieces	30	30	30	30	30	30	30	30	30
Set Up	2	2	5	2	3	2	2	2	2
Selecting Samples	10	6	14	6	7	8	8	8	4
Weighing / Recording Samples	20	35	9	21	20	30	20	28	16
Matching Worksheet to Manifest	25	21	30	22	27	25	28	25	18
Validating Postage Statement to Manifest	5	4	9	6	8	5	6	5	4
Transferring Postage Statement to Post Office	5	5	5	6	5	5	36	5	4
Other (explanation)									
<b>Post Office Tasks</b>									
Permit System Entry of Postage Due	5	8	7	15	15	10	5	5	15
<b>TOTAL</b>									

**Sources**  
 [1] through [4]: Data collected directly through :  
 [5]: Only includes volume when have entered d  
 [6]: Sum of each row.  
 [7]: [6] / [5].

**Postage Due**

USPS Return Technician	Location C [3] <sup>1</sup>							
	A	B	C	D	E	H <sup>2</sup>	I	J
Pieces	45	40	45	50	50	80	40	40
Set Up	5	10	15	5	20	5	10	10
Selecting Samples	10	10	10	15	10	20	5	10
Weighing / Recording Samples	35	30	30	30	25	120	35	30
Matching Worksheet to Manifest	30	30	30	30	30	30	30	30
Validating Postage Statement to Manifest								
Transferring Postage Statement to Post Office								
Other (explanation)	10 travel	5 travel	10 travel	10 travel	10 travel			
<b>Post Office Tasks</b>								
Permit System Entry of Postage Due	10	10	15	10	30			
<b>TOTAL</b>								

**Sources**

- [1] through [4]: Data collected directly through e
- [5]: Only includes volume when have entered d
- [6]: Sum of each row.
- [7]: [6] / [5].

**Postage Due**

**Location D [4]**

<b>USPS Return Technician</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>	<b>I</b>	<b>J</b>	<b>K</b>	<b>L</b>	<b>M</b>
Pieces	30	30	30	30	30	30	30	30	30	30	30	30	30
Set Up	55	35	25	25	30	30	21	29	30	31	30	20	30
Selecting Samples	34	30	--	31	45	25	34	--	63	45	33	32	40
Weighing / Recording Samples	38	28	35	85	70	55	87	65	65	70	37	85	75
Matching Worksheet to Manifest	80	70	70	95	75	67	92	75	80	75	65	90	105
Validating Postage Statement to Manifest	30	40	35	35	35	18	38	50	20	20	20	35	32
Transferring Postage Statement to Post Office													
Other (explanation)													
<b>Post Office Tasks</b>													
Permit System Entry of Postage Due													
<b>TOTAL</b>													

**Sources**

- [1] through [4]: Data collected directly through s
- [5]: Only includes volume when have entered d
- [6]: Sum of each row.
- [7]: [6] / [5].

Postage Due	Volume		Time	
	[5]	[6]	[6]	[7]
<b>USPS Return Technician</b>				
Pieces				
Set Up	1380	674	0.488	
Selecting Samples	1320	738	0.559	
Weighing / Recording Samples	1380	1667	1.208	
Matching Worksheet to Manifest	1350	2410	1.785	
Validating Postage Statement to Manifest	660	460	0.697	
Transferring Postage Statement to Post Office	270	76	0.281	
Other (explanation)	260	180	0.692	
<b>Post Office Tasks</b>				
Permit System Entry of Postage Due	800	245	0.306	
<b>TOTAL</b>				<b>6.018</b>

**Sources**

- [1] through [4]: Data collected directly through :
- [5]: Only includes volume when have entered d
- [6]: Sum of each row.
- [7]: [6] / [5].

**POSTAL RATE COMMISSION  
DOCKET NO. MC2006-1  
PARCEL RETURN SERVICE**

I, Michael W. Miller, hereby declare under penalty of perjury that:

*The Direct Testimony of Michael W. Miller on Behalf of the United States Postal Service, denominated USPS-T-2, was prepared by me or under my direction;*

Were I to give this testimony orally before the Commission, it would be the same;

The interrogatory responses filed under my name, and designated for inclusion in the record of this docket, were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories, my answers would be the same.

  
\_\_\_\_\_  
Michael W. Miller

1/6/06  
Date

**United States Postal Service**

**Institutional**

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-1. Please review the Docket No. MC2003-2 Stipulation and Agreement, Attachment C, Section C. Please provide the "second report" for FY 2005, sections A and B. If you are unable to provide the "second report," please explain why.

RESPONSE:

The next report due is for the period 7/1/05 through 12/31/05, which has not yet ended.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-2. In Docket No. MC2003-2, witness Kiefer, on page 15 of his testimony, stated that in the developmental stages of the Parcel Return Service (PRS) products, the Postal Service had "numerous" discussions with mailers.

- a. Has the Postal Service had any additional discussions with the current users of the Parcel Return Service regarding future volume projections? If so, please provide a detailed summary of any discussions related to future volume estimates. If not, please explain how the Postal Service arrived at the need for PRS beyond FY 2006.
- b. Has the Postal Service had any additional discussions with the current users of the Parcel Return Service regarding operational problems – other than the return label problem – relating to PRS? If so, please provide a detailed summary of those discussions, actions taken to resolve problems and the final resolution. If no problems were identified, please so state.
- c. Has the Postal Service had any PRS "staging" issues and if so, how are those issues being handled? (Docket No. MC2003-2, USPS-T-1 at 12.)
- d. Has either the Postal Service or the current users of the PRS had service related issues regarding timely pick-up of the PRS packages at the RBMC or the RDU? If so, please provide a detailed summary of those discussions and the final resolution. If no problems were identified, please so state.
- e. Has any participant taking part in the PRS experiment complained or taken issue with the quality of service received from the USPS? If so, please provide a detailed summary of those discussions listing all service related issues and the final resolution. If no problems were identified, please so state.

RESPONSE:

- a. Yes. Detailed records were not maintained concerning these discussions, which involved information that is proprietary to the participants.
- b. Formal records have not been maintained concerning PRS problem-related discussions that may have taken place between postal personnel and the participants. In general, there have been reports of missorts. Additional training and management attention has been given to the process, including service talks, new signage, and improved quality control procedures. There have been occasional issues surrounding missed pickup appointments, which have been addressed typically at the local level.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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- c. Extensive staging issues do not exist at this time. When the volume during any given time appears to be abnormally excessive, local officials typically contact the participant and transportation is arranged to address the problem.
- d. The timeliness of pick-up is not currently a major issue. If the transportation vendor does not pick up the mail on a given day, local officials typically contact the participant and transportation is arranged to address the problem.
- e. No.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-3. Please include in your response to this interrogatory cites to all source documents used, provide copies of all source documents not previously filed in this docket, and show the derivation of all calculated values. The current PRS experiment has elicited only two third-party participants. Given the experience the Postal Service has garnered during the experiment, please respond to the following:

- a. The average actual square footage used to store PRS parcels per merchant or third-party vendor per week for RBMCs and RDUs. Please include in your response cites to all source documents, provide copies of those documents not previously filed in this docket and show the derivation of all calculations.
- b. Where in each RBMC and RDU does the Postal Service expect to store increased PRS returned parcel volumes if more merchants or third-party vendors participate? Please fully explain your response.
- c. At what volume level of PRS return parcels destined to RBMCs will the Postal Service need to either adjust operations and/or expand facilities to accommodate the PRS parcel storage? Please fully explain your response.
- d. At what volume level of PRS return parcels destined to RDUs will the Postal Service need to either adjust operations and/or expand facilities to accommodate the PRS parcel storage? Please fully explain your response.

RESPONSE:

- a. This information has not been collected.
- b. At the current time, there are only two PRS participants. Any changes in staging needs due to an increase in the number of participants will be addressed at the local level, if and when such changes occur. Field observations indicate that staging has not been a major issue during the course of this experiment.
- c.d. Please see the response to b. There has been no need to attempt to determine the volume levels at RDUs and RBMCs that would result in the need for staging changes. Presumably, such levels vary locally and could best be addressed individually. To the extent that staging might need to be addressed across the board, mail processing operations and/or the requirements for frequency of pick ups could be adjusted.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-4. In Docket MC2003-2, the Postal Service restricted access to the Return Delivery Unit (RDU) to participants electing the "early bird" option. (Docket No. MC2003-2, USPS-T-1 at 16.) Does the Postal Service anticipate continuing this restriction if the PRS is offered on a permanent basis? Please fully explain your response.

RESPONSE:

No. The Postal Service will extend availability, depending on market demand.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-5. In Docket No. MC2003-2, USPS witness Keifer (USPS-T-3 at 4) indicated that the Postal Service did not have volumes for Parcel Return Service (PRS). The experimental PRS was expected to provide information to improve the data available for PRS rate design. For each year, FY 2004 and FY 2005, please provide total PRS volumes by weight category and by zone. Provide cites to all source documents and provide copies of those documents not filed in this docket.

RESPONSE:

Data are not available in Fiscal Year increments. See Witness Koroma's (USPS-T-3) workpapers at WP-PRS-3 for four quarters (July 2004 through June 2005) of PRS volumes by weight category and by zone which he used in the rate design.

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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OCA/USPS-6. In Docket No. MC2003-2, USPS witness Keifer (USPS-T-3 at 17) indicated that the proposed changes "will offer merchants and their agents a faster way to take possession of their customers' returns...." Currently, what evidence does the USPS have that indicates the success of this service? Please include in your response specific data comparing the speed with which agents take possession of their customers' returns using PRS and the alternative service. Cite all source documents relied upon to respond to this query, show the derivation of all calculated values and provide copies of those documents not previously filed in this docket.

RESPONSE:

Year-over-year growth of approximately 100% and scores of end-users indicate the success of this service. The Postal Service is not able to track end-to-end transit time.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

**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.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE**

(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.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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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.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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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

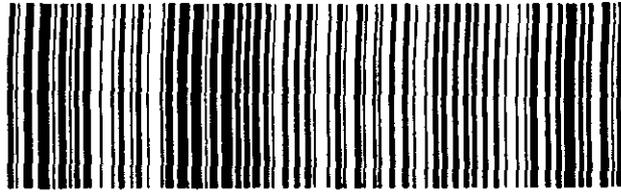
**Third Report:**

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

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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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	<b>NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES</b>
<b>PARCEL SELECT RETURN SERVICE</b> ABC RETURNS INC <span style="float: right;">PERMIT NO. 77999</span>	
<b>BMC ZIP - USPS PARCEL RETURN SVC</b>  420 56999 9157 0268 3733 1000 0010 15	<b>AGENT / CLIENT NAME PARCEL RETURN SERVICE 56999</b>
<b>X01</b>	

Generic RBMC label

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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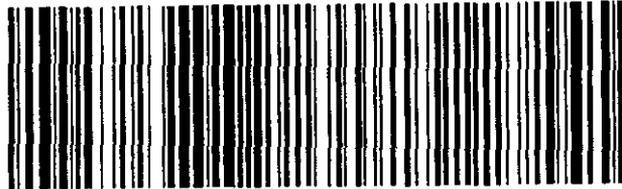
John Doe  
1258 Return Ln  
Bethesda MD 20817

**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.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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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."

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-9.** Please refer to the response to OCA/USPS-1, filed November 14, 2005. The response indicates that the next data collection report is not due until after December 31, 2005 for the period July 1, 2005 to December 31, 2005. In order to provide the most up-to-date information available for this docket, please submit an updated report, including both parts A and B, covering the period July 1, 2005 to November 1, 2005.

**RESPONSE:**

**A1. Volume by RDU and RBMC, by weight and zone (as possible).**

Due to the fact that only two Parcel Select customers are participating, these data are not provided.

**A2. Weekly volume for each RDU and RBMC (identification of facility names/locations not required and data may be provided electronically in a PC-compatible format without hardcopy).**

Due to the fact that only two Parcel Select customers are participating, these data are not provided.

**A3. Pickup frequency by facility type.**

Both participants pick up Parcel Select Return Bulk Mail Center (RBMC) product pieces at all 21 BMCs. The pickup frequency varies by mailer and facility, ranging from two days a week to five days per week. In most cases, the participants retrieve the PRS mail pieces three or five days per week.

As of September 30 2005, the Return Delivery Unit (RDU) service has been rolled out to 1,368 Delivery Units within 61 districts. On average, preliminary field observations indicate that the PRS participants retrieve the mail pieces three days per week.

**A4. Number and types of facilities used as pickup locations.**

See response to A3.

**A5. Evaluation of whether the process flows match those used to estimate costs.**

The mail processing cost estimates have been revised as described in Docket No. MC2006-1, USPS-T-2, Section III.B.

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**A6. To the extent possible, RDU volume broken down between regular-sized and oversized parcels.**

Due to the fact that only two Parcel Select customers are participating, these data are not provided.

**A7. RBMC volume broken down among machinable, non-machinable and oversized parcels.**

Due to the fact that only two Parcel Select customers are participating, these data are not provided.

**A8. Number of pieces addressed to an RDU but picked up at an RBMC, broken down into machinable, non-machinable, and oversized groups.**

Please see the report filed on August 22, 2005.

**A9. To the extent possible, the number of machinable pieces addressed to an RBMC or an RDU that were transported inter-BMC.**

It is estimated, on average, that 1.8 percent of the mail pieces isolated as PRS at a given BMC were actually entered as origin mail within the service area of another BMC.

**A10. The number of shippers participating in BPM PRS.**

Zero.

**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.**

Both participants are now using the RBMC and RDU products.

**B1. Review operations being performed and comment upon potential adjustments to the list of RBMC and RDU return service mail processing activities listed on USPS-T-2, Attachment C, at pages 10-15.**

Mail processing modifications to the model filed in Docket No. MC2003-2, USPS-T-2, Attachment C, at pages 10-15 are described in Docket No. MC2006-1, USPS-T-2, Section III.B.

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**B2. Comment upon the accuracy of the percentage estimates provided in USPS-T-2, Attachment C, page 6, i.e., that containers are as full as estimated, separately for RBMC and RDU activities.**

The percentage full estimates appear reasonable. Field observations have shown that most containers being dispatched to PRS processing facilities exceed 100 percent full, if the top of the container is defined as being 100 percent.

**B3. Provide a ballpark (or more precise) estimate of the capacity utilization (pieces per container) for Parcel Return Service containers and compare it to the estimate in USPS-T-2, Attachment D.**

During limited sampling, there appeared to be some variation among the participants as to the number of machinable pieces per container. The range was from 50 pieces to 110 pieces.

The number of nonmachinable / oversize pieces per NMO container was found to fall between 20 pieces to 30 pieces.

**B4. To the extent possible, review and comment upon whether the productivities in USPS-T-2, Attachment C, pages 2 and 3, continue to reflect best current estimates.**

The productivity data relied upon in the PRS cost model have been revised as described in Docket No. MC2006-1, USPS-T-2, Section III.B.

**B5. Review and comment upon the actual sampling operations for manifest review as compared to the planned operations.**

The sampling methods and procedures are likely to evolve over time. At the current time, however, the sampling operations included in the cost model reflect those performed in the field.

**B6. Review and comment upon the accuracy of the travel time estimate incorporated into USPS-T-2, Attachment G, page 1, based upon a sample of actual travel times to shipper locations by Postal Service Return Technicians.**

As described in B5, the sampling methods currently being used reflect those performed in the field. Consequently, the travel time estimate is also reasonable.

**B7. Review and comment upon the accuracy of the estimate for the average number of pieces per manifest in USPS-T-2, Attachment H.**

Due to the fact that only two Parcel Select customers are participating, this response is not provided.

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**B8. Review and comment upon whether the estimated storage days for RBMC and RDU in USPS-T-2, Attachment D are correct or need to be revised.**

The storage cost estimate has been revised as described in Docket No. MC2006-1, USPS-T-2, Section III.C.

**B9. Review and comment upon the extent of the need for adjustments in pick-up schedules to alleviate excessive storage time.**

During field observations, several BMC managers mentioned that there were instances when either (1) PRS mail had not been picked up as scheduled, or (2) additional transportation was required due to higher than expected mail volume. In all cases, they mentioned that their efforts to work with the participants to solve the problems had, for the most part, been successful. Over time, the occurrence of such adjustments appears to have decreased.

**B10. Review and comment upon the accuracy of the following estimates used in USPS-T-2, Attachments C and D.**

**a. The estimated units per hour for sorting parcels to mailers for RBMC machinable returns (125.4 units/hr), RBMC non-machinable returns (100 units/hr) and RBMC non-machinable oversized returns (100 units/hr).**

Please see the response to B4.

**b. The estimated units per hour for sorting parcels to mailers for RDU machinable mail (460.6 units/hr).**

Please see the response to B4.

**c. The estimated space utilization storage costs estimated for RBMC and RDU rate categories beyond what is reported in response to Part B, subpart (8).**

The storage cost estimate has been revised as described in Docket No. MC2006-1, USPS-T-2, Section III.C.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**OCA/USPS-10.** Please refer to the responses to interrogatories OCA/USPS-7 and OCA/USPS-9. For each of the following Report items, describe in detail the method used to collect the data reported. Include in the description: the position(s) of personnel (1) collecting the data and (2) reporting the data; the dates that data were collected; the medium used to collect the data (e.g., telephone, mail, direct observation); and how many discrete observations were made.

- a. First Report, Items A2, A3, A4, and A5 (OCA/USPS-7)
- b. Second Report, Items A2, A3, A4, and A5; Items B1, B4, B5, B6, B8, and B10 (OCA/USPS-7).
- c. Third Report, Items A2, A3, A4, and A5 (OCA/USPS-7).
- d. Reports made in response to OCA/USPS-9, Items A1, A2, A3, A4, A5, A6, A7, A8, A9, A10, and A11; B1, B2, B3, B4, B5, B6, B7, B8, B9, and B10.

**RESPONSE:**

**(a) FIRST DATA COLLECTION REPORT**

This information was reported on August 25, 2004 by the United States Postal Service.

The information was collected from various parties in multiple functions and was reviewed by a cross-functional group prior to being submitted to the Commission. The following responses therefore specify positions with regard to data collection only.

**Item A2:** Volume data have not been reported due to the fact that only two participants have been using the PRS products. Volume data have been collected using the electronic manifest file each mailer sends to the Postal Service on a daily basis. These data collection activities are supervised by the Manager, Ground Products, Package Services, at Headquarters.

**Items A3, A4, and A5:** In the response to A3, it was indicated that one mailer was retrieving PRS at 17 Bulk Mail Centers. That information was obtained from a marketing specialist who maintained regular email and phone contact with representatives of both participants. As indicated in the response to Item A5, an economist conducted field observations at 13 Bulk Mail Centers. Information that was collected during these field observations was used in the responses to all three items. The dates these field observations were conducted were as follows: 3/31/04, 4/15/04, 4/16/04 (2 BMCs), 4/19/04, 4/20/04, 4/21/04, 4/22/04, 4/23/04, 4/30/04, 5/20/04, 6/17/04, and 7/19/04. The field observations generally consisted of a tour that was provided by a BMC representative familiar with PRS operations and procedures.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**(b) SECOND DATA COLLECTION REPORT**

This information was reported on February 28, 2005 by the United States Postal Service. The information was collected from various parties in multiple functions and was reviewed by a cross-functional group prior to being submitted to the Commission. The following responses therefore specify positions with regard to data collection only.

**Item A2:** Please see the response to part (a) concerning volume data.

**Item A3:** Please see the response to part (a). The information concerning the Return Delivery Unit (RDU) product was obtained from a marketing specialist who maintained regular email and phone contact with representatives of both participants.

**Item A4:** Please see the response to part (a).

**Item A5:** At a given BMC, the PRS operations were fairly straightforward and did not undergo any significant changes once they had been established. Phone calls and emails were periodically exchanged between an economist and the BMC representatives to verify that no PRS operational changes had been implemented. Furthermore, periodic field observations were conducted at the Washington BMC, although no formal records were maintained. The goal of these visits was to determine whether any significant changes had been made.

**Item B1:** This response was based on the economist's field observations that are described above.

**Item B4:** Please see the responses to Docket No. R2005-1, POIR No. 4, Question 5 and Docket No. MC2006-1, OCA/USPS-T2-3.

**Items B5, B6:** These items were not specifically addressed in the report.

**Item B8:** This response was based on the economist's field observations that are described above.

**Item B10:** The response to part a was based on the updated PIMS data addressed in the response to B4. A response to part b was not provided, as neither mailer was using the RDU product. The response to part c was based on the economist's field observations that are described above.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**(c) THIRD DATA COLLECTION REPORT**

This information was reported on August 22, 2005 by the United States Postal Service. The information was collected from various parties in multiple functions and was reviewed by a cross-functional group prior to being submitted to the Commission. The following responses therefore specify positions with regard to data collection only.

**Item A2:** Please see the response to part (a) concerning volume data.

**Item A3:** Please see the response to part (a). The information concerning the Return Delivery Unit (RDU) product was obtained from the marketing specialist that coordinated field training efforts.

**Item A4:** Please see the response to part (a).

**Item A5:** Please see the response to part (b). The issue concerning the Non Machinable Outsides (NMO) and oversize cost models was discovered when preparing the cost models for the instant filing. The comments concerning the RDU product were based on an economist's field observations conducted at delivery units on 8/4/05, 8/5/05, 8/11/05, and 8/12/05. The field observations generally consisted of a tour that was provided by a delivery unit representative familiar with PRS operations and procedures.

**(d) OCA/USPS-9**

This information was filed on 12/1/05 (errata were filed on 12/5/05) by the United States Postal Service. The information was collected from various parties in multiple functions and was reviewed by a cross-functional group prior to filing. The following responses therefore specify positions with regard to data collection only.

**Items A1, A2:** Please see the response to part (a) concerning volume data.

**Item A3:** Please see the response to part (a). The information concerning the Return Delivery Unit (RDU) product was obtained from the marketing specialist that coordinated field training efforts.

**Item A4:** Please see the response to part (a).

**Item A5:** Please see Docket No. MC2006-1, USPS-T-2, Section III.B.

**Items A6, A7:** Please see the response to part (a) concerning volume data.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**Item A8:** As stated in the third data collection report, these data are not available.

**Item A9:** Please see the response to part (a) concerning volume data.

**Item A10:** No response is required given that no participants have ever used the BPM PRS product and no request has been submitted in the instant proceeding for permanent BPM PRS rates.

**Item A11:** This information was obtained from the marketing specialist that coordinated PRS training efforts.

**Item B1:** Please see Docket No. MC2006-1, USPS-T-2, Section III.B.

**Item B2:** This response was based on the economist's field observations that are described above.

**Item B3:** This information was collected by an economist on 12-9-04, 12-17-04, and 12-23-04. A total of five machinable RBMC containers and three NMO/oversize containers were sampled.

**Item B4:** Please see the response to part (c).

**Item B5:** This information was provided by the marketing specialist that coordinated PRS training efforts.

**Item B6:** The costs associated with sampling were based on actual field data collected prior to Docket No. MC2003-2. Given that sampling procedures had not changed at the time Docket No. MC2006-1 was filed, the Docket No. MC2003-2 data were again used.

**Item B7:** No response was provided.

**Item B8:** Please see the response to OCA/USPS-T2-9.

**Item B9:** This response was based on the economist's field observations that are described above.

**Item B10:** For part a, please see Docket No. MC2006-1, USPS-T-2, Section III.B. For part b, the estimate appeared reasonable based on the economist's delivery unit field observations described above. For part c, please see Docket No. MC2006-1, USPS-T-2, Section III.C.

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS MILLER

**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.

**RESPONSE:**

Please see the attached.

SUPPLEMENTAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS MILLER

**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.

**RESPONSE:**

Please see the attached.

### Summary of Estimated Cost Differences Compared to Benchmark

	Acceptance [1]	Mail Processing [2]	Storage [3]	Transportation [4]	Scanning [5]	Postage Due [6]	Total [7]
<b>RBMC</b>							
<b>Machinable</b>	(\$0.033)	(\$0.616)	\$0.017	(\$0.942)	\$0.000	\$0.073	(\$1.501)
<b>Non-machinable</b>	(\$0.033)	(\$1.262)	\$0.114	(\$6.160)	\$0.000	\$0.073	(\$7.268)
<b>Oversize</b>	(\$0.033)	(\$2.025)	\$0.338	(\$17.604)	\$0.000	\$0.073	(\$19.251)
<b>RDU</b>							
<b>Machinable</b>	(\$0.033)	(\$1.467)	\$0.046	(\$1.040)	\$0.077	\$0.000	(\$2.417)
<b>Non-machinable</b>	(\$0.033)	(\$5.523)	\$0.311	(\$6.802)	\$0.077	\$0.000	(\$11.970)
<b>Oversize</b>	(\$0.033)	(\$13.347)	\$0.922	(\$19.440)	\$0.115	\$0.000	(\$31.783)

**Sources**

- [1] Attachment B, page 1.
- [2] Attachment C, page 1.
- [3] Attachment D, page 1.
- [4] Attachment E, page 1.
- [5] Attachment F, page 1.
- [6] Attachment G, page 1.
- [7] Sum of [1] through [6].

## Acceptance Cost Difference Summary (per piece)

### Retail Cost Difference

	Unit Costs	
PRS	\$0.231	1/
Intra-BMC (retail)	\$0.662	2/
<b>Cost Difference</b>	<b>(\$0.431)</b>	<b>3/</b>

### Bulk Cost Difference

	Unit Costs	
PRS	\$0.231	4/
Intra-BMC (bulk)	\$0.016	5/
<b>Cost Difference</b>	<b>\$0.215</b>	<b>6/</b>

### Weighted Average Cost Difference

	Distribution [1]	Cost Difference [2]	
Entered at Window (Retail)	38.5%	(\$0.431)	2a
Entered in Bulk (Non-retail)	61.5%	\$0.215	2b
<b>Weighted Average Cost Difference per piece</b>		<b>(\$0.033)</b>	<b>2c</b>

#### Sources

1/: Attachment B, page 3.

2/: Attachment B, page 2.

3/: (1) -(2).

4/: Attachment B, page 3.

5/: Attachment B, page 4..

6/: (4) - (5).

[1]: Docket R2005-1, USPS-LR-K-46, page 6

[2]: Estimated cost differences

[2a]: (3).

[2b]: (6).

[2c]: Estimated costs in [2a] and [2b] weighted by percentages in [1].

**Intra-BMC Retail Transactions**  
**Cost Per "Weight/Rate" Transaction**

Transaction Time (in seconds)			64.800	1/
Transaction Time (in minutes)			1.080	2/
TY 06 Wage Rate (per hour)			\$36.344	3/
TY 06 Wage Rate (per minute)			\$0.606	4/
Direct Cost per transaction			\$0.654	5/
Misc. Volume Variable Window Costs	11.50% x	\$0.654 =	\$0.075	6/
		+	<u>\$0.654</u>	
			\$0.729	
Waiting Time Adjustment	20.40% x	\$0.654 =	\$0.133	7/
		+	<u>\$0.729</u>	
			\$0.863	
Variability	56.37% x	\$0.863 =	\$0.486	8/
Piggyback Factor	1.361 x	\$0.486 =	\$0.662	9/
Cost per minute for Retail Transaction		=	\$0.662	10/

**Sources**

- 1/: Docket No. R97-1, LR-H-167 (Transaction Time Study), Table 3.1, page 160, "weight/rate" task  
2/: (1) / 60.  
3/: Attachment C, page 4, line (6).  
4/: (3) / 60.  
5/: (2) x (4).  
6/: Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell F37 divided by cell E37  
(break time, clocking in and out, moving equip.)  
7/: Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell G37 divided by cell E37  
8/: Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell N37  
9/: Docket No. R2005-1, PRC-LR-6, file "PIGTY06NEW2.XLS", worksheet "summary", cell C25  
10/: Product from (9).

**PRS Retail Transactions**  
**Cost Per "Acceptance" Transaction**

Transaction Time (in seconds)		22.650	1/
Transaction Time (in minutes)		0.378	2/
TY 06 Wage Rate (per hour)		\$36.344	3/
TY 06 Wage Rate (per minute)		\$0.606	4/
Direct Cost per transaction		\$0.229	5/
Misc. Volume Variable Window Costs	11.50% x \$0.229 =	\$0.026	6/
		+ <u>\$0.229</u>	
		\$0.255	
Waiting Time Adjustment	20.40% x \$0.229 =	\$0.047	7/
		+ <u>\$0.255</u>	
		\$0.302	
Variability	56.37% x \$0.302 =	\$0.170	8/
Piggyback Factor	1.361 x \$0.170 =	\$0.231	9/
Cost per minute for Retail Transaction		= \$0.231	10/

**Sources**

- 1/ Docket No. R97-1, LR-H-167 (Transaction Time Study), Table 3.1, page 160, "acceptance" task  
 2/ (1) / 60.  
 3/ Attachment C, page 4, line (6)  
 4/ Row (3) / 60.  
 5/ (2) x (4)  
 6/ Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell F37 divided by cell E37  
 (break time, clocking in and out, moving equip).  
 7/ Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell G37 divided by cell E37  
 8/ Docket No. R2005-1, PRC-LR-3, file "CS03 - PRC.XLS", worksheet 3.2.1, cell N37  
 9/ Docket No. R2005-1, PRC-LR-6, file "PIGTY06NEW2.XLS", worksheet "summary", cell C25  
 10/ Product from (9)

### Intra-BMC Bulk Acceptance/Verification Cost Methodology

Docket No. MC2003-2 Unit Cost Estimate	1/	\$0.014
TY 2003 Window Service Wage Rate	2/	\$32.306
TY 2006 Window Service Wage Rate	3/	\$36.344
Cost Escalation Factor	4/	1.125
TY 2006 Unit Cost Estimate	5/	\$0.016

#### Sources

- 1/ Docket No. MC2003-2, USPS-T-2, Attachment B, page 4
- 2/ Docket No. MC2003-2, USPS-T-2, Attachment C, page 4
- 3/ Docket No. MC2006-1, USPS-T-2, Attachment C, page 4
- 4/ (3) / (2)

## Mail Processing Cost Estimate Summary Page

### Estimated Mail Processing Costs

	Modeled Costs [1]	CRA Adjustment Factors		Adjusted Costs [4]	
		Proportional [2]	Fixed [3]		
Intra-BMC Machinable	\$1.424	1.188	\$0.133	\$1.825	4a
Intra-BMC Non Machinable	\$5.050	1.188	\$0.133	\$6.134	4b
Intra-BMC Oversize	\$12.132	1.188	\$0.133	\$14.550	4c
RBMC Machinable	\$0.905	1.188	\$0.133	\$1.209	4d
RBMC Nonmachinable	\$3.988	1.188	\$0.133	\$4.872	4e
RBMC Oversize	\$10.428	1.188	\$0.133	\$12.525	4f
RDU Machinable	\$0.189	1.188	\$0.133	\$0.358	4g
RDU Nonmachinable	\$0.402	1.188	\$0.133	\$0.611	4h
RDU Oversize	\$0.901	1.188	\$0.133	\$1.204	4i

### Estimated Mail Processing Cost Differences

Rate Category	Benchmark	Cost Difference [5]	
RBMC Machinable	Intra-BMC mach	(\$0.616)	5a
RBMC Nonmachinable	Intra-BMC nmo	(\$1.262)	5b
RBMC Oversize	Intra-BMC over	(\$2.025)	5c
RDU Machinable	Intra-BMC mach	(\$1.467)	5d
RDU Nonmachinable	Intra-BMC nmo	(\$5.523)	5e
RDU Oversize	Intra-BMC over	(\$13.347)	5f

#### Sources

- [1] Modeled costs from Attachment C, pages 7-15  
 [2] Docket No. R2005-1, PRC-LR-9  
 [3] Docket No. R2005-1, PRC-LR-9  
 [4] [1] \* [2] + [3].  
 [5] Difference between Cost Category and Benchmark.  
 [5a]: (4a)-(4d).  
 [5b]: (4b)-(4e).  
 [5c]: (4c)-(4f).  
 [5d]: (4a)-(4g).  
 [5e]: (4b)-(4h).  
 [5f]: (4c)-(4i).

**Productivities and Variabilities for Direct Labor Operations**

	<b>Productivities</b>	
	<b>(Units per Wkhr)</b>	
<b>UNLOADING</b>		
Unload sacked machinable parcels to extended conveyor	194.8	1/
Unload machinable parcels to extended conveyor	648.5	1/
Unload non-machinable parcels	168.0	1/
Unload non-machinable parcels to IHC only (proxy for sacks)	160.5	1/
Unload wheeled containers	21.7	1/
Unload Pallets/Postal Paks/Pallet Box	12.8	1/
<b>DUMPING &amp; SACK HANDLING</b>		
Dump Containers	6.5	1/
Sack shake out	72.3	1/
Manually dump sacks at Non-BMC	107.4	2/
Sack sorter (PIRS 98)	348.3	3/
<b>PARCEL SORTING MACHINE DISTRIBUTION</b>		
PPSM	744.9	3/
SPSM	1664.3	3/
SPSM (Before the SSIU)	1224.0	4/
100 percent Key Rate	806.0	5/
<b>NONMACHINABLE OUTSIDES DISTRIBUTION</b>		
NMO Distribution	68.7	3/
NMO Distribution at SCFs	356.7	6/
Parcel Sort at AO	444.1	8/
<b>OTHER OPERATIONS</b>		
Tend container loader/sweep runouts	5.4	1/
Crossdock containers	7.3	1/
Sack and Tie	125.4	1/
<b>LOADING</b>		
Bedload NMOs to van from IHCs (proxy for machinables)	183.9	1/
Bedload Sacked Machinables	190.1	1/
Load wheeled containers	10.8	1/
Load Pallets/Postal Paks/Pallet Boxes	13.9	1/
<b>Variabilities</b>		
BMC Platform	0.91	7/
BMC Other	0.98	7/
PSM	1.00	7/
SSM	1.00	7/
SPBS	1.00	7/
NMO Distribution at BMCs	1.00	7/
Platform Non-BMC	0.93	7/
NMO Distribution at Non-BMCs	0.99	7/
LDC43	0.97	7/

**Sources**

- 1/: Docket No. R97-1, LR-H-132, page 329.  
2/: Proxy based on Planning Guidelines (PGLs)  
3/: GFY 2003 PIMS  
4/: National Database, PIRS average 1995 - 2000.  
5/: National Database, PIRS FY93, (pure keying, no prebarcode).  
6/: Docket No. R2005-1, USPS-LR-K-56  
7/: Docket No. R2005-1, PRC-LR-9  
8/: Docket No. R2001-1, LR-J-64, Attachment D, page 2 (sorting 5-digit to carrier-route).

### Arrival and Dispatch Profiles

	Arrival and Dispatch	
	Percentages	
<b>Mail Flow Arrival Profile at Originating BMCs</b>		
Machinable Parcels Arriving in Bedloaded Sacks at BMC	4.3%	1/
Machinable Parcels Arriving Bedloaded at BMC	7.0%	1/
Machinable Parcels Arriving sacked in OTRs at BMC	11.5%	1/
Machinable Parcels Arriving loose in OTRs at BMC	51.1%	1/
Machinable Parcels Arriving Palletized at BMC	1.6%	1/
Machinable Parcels Arriving in Pallet Boxes at BMC	0.9%	1/
Machinable Parcels Arriving in Hampers/APC/OWC (OWC) at BMC	23.6%	1/
Non-Machinable Parcels Arriving Bedloaded at BMC	4.0%	1/
Non-Machinable Parcels Arriving Palletized at BMC	1.3%	1/
Non-Machinable Parcels Arriving in OTR Containers at BMC	72.5%	1/
Non-Machinable Parcels Arriving in Hampers/APC/OWC (OWC) at BMC	22.2%	1/
<b>Mail Flow Arrival Profile from Origin BMCs to Destination BMCs</b>		
Machinable Parcels Arriving in Postal Paks at Destination BMC (from Origin BMC)	100.0%	2/
NMOs Arriving Palletized at Destination BMC (from Origin BMC)	100.0%	2/
<b>Mail Flow Arrival at Destinating BMCs for DBMC parcels</b>		
Machinable Parcel Arriving Bedloaded at DBMC	96.2%	3/
Machinable Parcels Arriving on Pallets at DBMC	0.3%	3/
Machinable Parcels Arriving in OTRs at BMC	0.8%	3/
Machinable Parcels Arriving in Gaylords at DBMC	2.6%	3/
Machinable Parcels arriving in OWC at DBMC	0.1%	3/
Non-Machinable Parcels Arriving Bedloaded at DBMCs	98.5%	3/
Non-Machinable Parcels Arriving in Pallet Boxes at DBMC	0.7%	3/
Non-Machinable Parcels Arriving on Pallets at DBMC	0.8%	3/
<b>Mail Flow Dispatch Profiles From BMCs to Service Area</b>		
Machinable Parcels Dispatched in Bedloaded Sacks to Service Area	23.8%	4/
Machinable Parcels Dispatched loose in OTRs to Service Area	60.3%	4/
Machinable Parcels Dispatched sacked in OTRs to Service Area	2.9%	4/
Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Service Area	13.0%	4/
Non-Machinable Parcels Dispatched Bedloaded to Service Area	12.9%	5/
Non-Machinable Parcels Dispatched on Pallets to Service Area	31.0%	5/
Non-Machinable Parcels Dispatched in OTRs to Service Area	53.6%	5/
Non-Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Service Area	2.5%	5/
<b>Mail Flow Dispatch Profiles to Delivery Unit</b>		
Machinable Parcels Dispatched in Bedloaded Sacks to Delivery Unit	26.7%	6/
Machinable Parcels Dispatched loose in OTRs to Service Area to Delivery Unit	60.3%	6/
Machinable Parcels Dispatched in OWC to Delivery Unit	13.0%	6/
Non-Machinable Parcels Dispatched Bedloaded to Delivery Unit	26.7%	7/
Non-Machinable Parcels Dispatched in OTRs to Delivery Unit	60.3%	7/
Non-Machinable Parcels Dispatched in Hampers/APC/OWC (OWC) to Delivery Unit	13.0%	7/

#### Sources

- 1/ Docket No. R97-1 USPS LR-H-131, Table 1. Assume 61.6% of bedloaded is loose and 38.4% is sacked.  
Assume 81.6% percent of mail in OTRs is loose and 18.4% percent is sacked (Docket No. R97-1, LR-H-132, page 277).
- 2/ Assumptions that 100 percent of parcels going from BMC to BMC will be in Postal Paks
- 3/ Unload Profile and # of handlings are from Docket No. R97-1 USPS-LR-H-131, Table 2
- 4/ Docket No. R97-1 USPS LR-H-132, Attachment 1, page 274
- 5/ Docket No. R97-1 USPS LR-H-132, Attachment 3, page 278
- 6/ Assume same as dispatch profile as BMC, but sacks in OTRs get bedloaded.
- 7/ Use Dispatch profile of machinables as a proxy, use bedloaded sacks for bedloaded NMOs.

**Piggyback Factors, Wages, Mail Flow Operating Assumptions**

<b>Wage Rate with Premium Pay Factor Applied</b>	\$35.371	1/
<b>Premium Pay Factor</b>	0.989	2/
<b>TY Other mail processing wage rate</b>	\$35.772	3/
<b>Window Service Adjustment Factor</b>	1.075	4/
Window Service Base year wage rate	33.804	5/
Window Service Test year wage rate	36.344	6/
<b>Mail Processing Operation Specific Piggyback Factors</b>		
NMO Sorting at BMC	1.633	7/
Other Operations at BMCs	1.567	7/
Platform BMC	1.664	7/
Primary Parcel Sorting Machine	2.068	7/
Secondary Parcel Sorting Machine	4.923	7/
Sack Sorting Machine - BMC	2.346	7/
NMO Sorting at SCF	1.359	7/
Platform Non-BMC	1.495	7/
NonMODS Allied	1.839	7/
NonMODSMANP	1.684	7/
Window Service Piggyback factor (Parcel Post)	1.129	8/
<b>Mail Flow Operating Assumptions</b>		
Percent with <i>direct transportation to destinating delivery unit from BMC</i>	12.3%	9/
Percent Sorted to 5-Digits by Primary Parcel Sorting Machine	20.1%	10/
Destinating BMCs will feed barcoded destinating mail unfiltered to secondary	20.8%	11/
Probability that mail fed directly to nonspecific secondary will receive more than one sort	50.0%	12/
Probability that barcode on secondary will not be readable	3.0%	13/
Proportion of parcel singulators (SSIU) being at secondary	100.0%	14/
Proportion sent from secondary to primary due to SSIU	3.0%	15/
Probability of Inter-BMC parcel going to primary psm at destination BMC	85.7%	16/
Probability of Inter-BMC parcel being handled by SSIU in destination BMC	94.5%	17/
Probability of Intra-BMC and DBMC parcels going to primary psm (or get keyed)	100.00%	18/
Probability of Intra-BMC and DBMC on secondary psm	79.9%	19/
Probability that NMOs will NOT be inducted on the conveyor system (not used for NMOs over 10)	41.2%	20/
Probability that NMOs will be NOT be moved using towveyor (not used for pallets)	31.4%	20/
Probability that PRS machinable mail pieces are processed on the PPSM	97.4%	21/
Probability that PRS machinable mail pieces are processed on the SPSM	24.8%	21/

**Sources**

- 1/: (2) x (3)  
2/: Docket No. R2005-1, USPS-LR-K-55  
3/: Docket No. R2005-1, USPS-LR-K-55  
4/: (6) / (5)  
5/: Docket No. R2005-1, USPS-LR-K-55  
6/: Docket No. R2005-1, USPS-LR-K-55  
7/: Docket No. R2005-1, PRC-LR-9  
8/: Docket No. R2005-1, PRC-LR-9  
9/: USPS LR-PCR-40, page 64.  
10/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [10]  
11/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [9]  
12/: Assumption that mail going to secondary PSM will be evenly split between scheme 1 and scheme 2.  
13/: Assumption used by Operations.  
14/: Assumption used by Operations.  
15/: (14) x (15).  
16/:  $[1 - (12)] + \{[(16) \times (12)] + \{[(1) - (12)] \times [(1) - (11)] \times (16)\} + \{(11) \times (12) \times [(1) - (16)]\}$ .  
17/:  $(12) + [(11) \times (13)] + [1 - (12)] \times [(1) - (11)]$   
18/:  $1 + [1 - (11)] \times (16)$ .  
19/:  $1 - (11)$ .  
20/: Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [11]

## Other Inputs

### FY 2004 Volumes

	Percents		machinable [3]	NMO		Total [6]
	% mach [1]	% over [2]		(non oversize) [4]	Oversize [5]	
Inter-BMC	94.5%	0.063%	73,627,919	4,217,546	48,858	77,894,322
Intra-BMC	94.3%	0.099%	29,007,959	1,710,042	30,331	30,748,332
DBMC	93.4%	0.094%	81,164,769	5,617,204	81,739	86,863,713
DSCF	93.4%	0.094%	2,787,960	192,948	2,808	2,983,715
DDU	93.4%	0.094%	160,094,387	11,079,720	161,227	171,335,334
Total			346,682,994	22,817,459	324,963	369,825,416

### Calculation of Percent of Inter and Intra entered at origin AO

Percent of inter-BMC that is retail	25.6%	1/
Percent of intra-BMC that is retail	38.5%	2/

### Average Cubic Feet of Parcel Post

	[7]
Machinable	0.425
Non-machinable	2.777
Oversize	7.938

### Sources

Rows (1&2): Docket R2001-1, LR-J-64, Attachment A, page 6

Column [1]: Docket R2001-1, LR-J-67, Attachment A, page 6 Machinable volume / total volume.

Column [2]: Docket R2001-1, LR-J-67, Attachment A, page 6 Nonmachinable volume / total nonmachinable volume.

Column [3]: Column [1] \* column [6]

Column [4]: Column [6] - column [3] - column [5]

Column [5]: Column [2] \* column [6]

Column [6]: GFY2004 RPW volumes

Column [7]: Docket No. R2005-1, USPS-LR-K-47

Conversion Factor Calculations

Container Type	Outside Dim. Per Container (Inches) [1]	Inside Dim. Per Container (Inches) [2]	Cubic Feet Per Container [3]	Effective Parcel Capacity (# of Parcels) [4]	Capacity at Average Fullness (# of Parcels) [5]	Average % FULL [6]
<b>Machinable</b>						
Pallet	48x40x48	48x40x48	53.3	125.6	106.8	85%
Postal Pak	48x40x69	46.5x38.5x69	71.5	153.1	130.1	85%
Pallet Box	48x40x69	46.5x38.5x69	71.5	153.1	134.7	88%
Pallet Box (for space)	48x40x70	46.5x38.5x70	71.5	153.1	114.8	75%
Sacks on In-house Container	65x41.5x36	65x41.5x36	56.2	120.3	102.3	85%
<b>NMOs</b>						
Pallet	48x40x48	48x40x48	53.3	19.2	19.2	100%
Pallet Box	48x40x69	46.5x38.5x69	71.5	23.4	19.9	85%
In-house Container	65x41.5x36	65x41.5x36	56.2	18.4	15.6	85%
<b>Oversize NMOs</b>						
108"-130" on Pallet	48x40x48	48x40x48	53.3	6.7	6.7	100%
108"-130" in IHC	65x41.5x36	65x41.5x36	56.2	6.4	6.4	100%

Pieces Per Container	Machinable		Nonmachinable		108"-130"
	R2000-1 (FY98) [7]	R2005-1 (FY04) [8]	R2000-1 (FY98) [9]	R2005-1 (FY04) [10]	R2005-1 (FY04) [11]
Sack	5.1	7.0	n/a	n/a	n/a
Sack in OTR	81.8	112.0	n/a	n/a	n/a
OTR	69.0	94.5	27.1	19.5	6.8
APC	35.7	48.8	14.0	10.1	3.5
Hamper	23.0	31.5	9.0	6.5	2.3

	Cubic Feet Per Parcel Post			No. of Sacks	No. of Sacks
	Machinable [12]	NMO [13]	108"-130" [14]	on IHC [15]	on Postal Pak [16]
R2005-1 (BY04)	0.425	2.777	7.94	14.61	18.59
R2000 (BY98)	0.581	1.992			

Sources

- Column [1] & [2]: Container Methods Handbook PO-502 (September 1992); USPS LR #13.
- Column [3]: (Length \* width \* height) / 12<sup>3</sup> \* 12.
- Column [4]: (Column [3]) / ((column [13]) \* air factor), to account for "effective cube" and (column [1]) / ((column [14]) \* air factor) and (column [3]) / ((column [16]) \* air factor).  
Air factor = 1 for pallets and 1.1 for all else.
- Column [5]: Effective cubic capacity (column [4]) \* average % fullness (column [6]).
- Column [6]: Pallets, postal paks and IHCs should be as full as practicable before dispatch so it is reasonable to assume these containers will be at least 85% full.  
The majority of pallet boxes come from mailers who must have 75 percent full boxes, and tend to fill them to maximize capacity.  
Therefore 88 percent, the average of 75 and 100 percent was used.
- Column [7]: Docket No. R84-1, Exhibit USPS-14.
- Column [8]: Pieces per container in Docket No. R84-1 (column [7]) \* FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [9]: Docket No. R84-1, Exhibit USPS-14.
- Column [10]: Pieces per container in Docket No. R84-1 (column [9]) \* FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [11]: Column [10] \* column [13] / column [15].
- Column [12]: Attachment C, page 5, column [7], machinable parcels.
- Column [13]: Attachment C, page 5, column [7], non-machinable parcels.
- Column [14]: Attachment C, page 5, column [7], oversize parcels.
- Column [15]: No. of parcels on IHC (column [5]) divided by no. of parcels in a sack (column [4]).
- Column [16]: No. of parcels on a parcel (column [5]) divided by no. of parcels in a sack (column [4]).

**Intra-BMC Machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.079</b>
Move Containers to Dock	0.3849	29.3	40.1	1.839	\$0.055	\$0.021
Load Containers	0.3849	10.8	40.1	1.839	\$0.150	\$0.058
<b>Origin SCF</b>						<b>\$0.346</b>
Unload Containers <sup>2</sup>	1.0000				\$0.043	\$0.043
Crossdock containers	1.0000	7.3	40.1	1.839	\$0.221	\$0.221
Bedload Sacks	0.0434	190.1	7.0	1.495	\$0.040	\$0.002
Bedload loose	0.0696	183.9	1.0	1.495	\$0.287	\$0.020
Load Sacks in OTRs	0.1152	10.8	112.0	1.495	\$0.044	\$0.005
Load Loose in OTRs	0.5108	10.8	94.5	1.495	\$0.052	\$0.026
Load Pallets	0.0160	13.9	106.8	1.495	\$0.036	\$0.001
Load Pallet Boxes	0.0090	13.9	134.7	1.495	\$0.028	\$0.000
Load OWCs	0.2360	10.8	40.1	1.495	\$0.122	\$0.029
<b>Destination BMC</b>						<b>\$0.616</b>
Unload Bedload Sack	0.0434	194.8	7.0	1.664	\$0.043	\$0.002
Unload Bedload Loose	0.0696	648.5	1.0	1.664	\$0.091	\$0.006
Unload Sacks in OTR	0.1152	21.7	112.0	1.664	\$0.024	\$0.003
Unload loose in OTR	0.5108	21.7	94.5	1.664	\$0.029	\$0.015
Unload Pallet	0.0160	12.8	106.8	1.664	\$0.043	\$0.001
Unload Pallet Boxes	0.0090	12.8	134.7	1.664	\$0.034	\$0.000
Unload Other Wheeled Cont	0.2360	21.7	40.1	1.664	\$0.068	\$0.016
Dump OTR of sacks	0.1152	6.5	112.0	1.567	\$0.077	\$0.009
Dump OTR of loose	0.5108	6.5	94.5	1.567	\$0.091	\$0.046
Dump Pallet	0.0160	6.5	106.8	1.567	\$0.080	\$0.001
Dump Pallet Boxes	0.0090	6.5	134.7	1.567	\$0.064	\$0.001
Dump Other Wheeled Cont	0.2360	6.5	40.1	1.567	\$0.214	\$0.050
Sack Sorter	0.1586	348.3	7.0	2.346	\$0.034	\$0.005
Sack shakeout	0.1586	72.3	7.0	1.567	\$0.110	\$0.017
PPSM	1.0000	744.9	1.0	2.068	\$0.098	\$0.098
SPSM	0.7991	1664.3	1.0	4.923	\$0.105	\$0.084
Sweep Runouts OTR	0.7327	5.4	94.5	1.567	\$0.108	\$0.079
Sack and Tie	0.2673	125.4	1.0	1.567	\$0.442	\$0.118
Bedload Sacks	0.2384	190.1	7.0	1.664	\$0.044	\$0.011
Load OTRs w/ sacks	0.0289	10.8	112.0	1.664	\$0.048	\$0.001
Load OTRs w/ loose	0.6025	10.8	94.5	1.664	\$0.057	\$0.035
Load Hampers/OWC	0.1302	10.8	40.1	1.664	\$0.135	\$0.018
<b>Destination SCF</b>						<b>\$0.159</b>
Unload Bedload Sacks	0.2091	160.5	7.0	1.495	\$0.047	\$0.010
Unload Sacks in OTR	0.0253	21.7	112.0	1.495	\$0.022	\$0.001
Unload loose in OTR	0.5284	21.7	94.5	1.495	\$0.026	\$0.014
Unload OWC	0.1142	21.7	40.1	1.495	\$0.061	\$0.007
Crossdock IHC (Bedload Sack)	0.2091	7.3	102.3	1.495	\$0.071	\$0.015
Crossdock Sacks in OTR	0.0253	7.3	112.0	1.495	\$0.064	\$0.002
Crossdock loose in OTR	0.5284	7.3	94.5	1.495	\$0.076	\$0.040
Crossdock OWC	0.1142	7.3	40.1	1.495	\$0.180	\$0.021
Bedload Sacks	0.2344	190.1	7.0	1.495	\$0.040	\$0.009
Load OTRs w/ loose	0.5284	10.8	94.5	1.495	\$0.052	\$0.027
Load Hampers/OWC	0.1142	10.8	40.1	1.495	\$0.122	\$0.014
<b>Destination Delivery Unit</b>						<b>\$0.224</b>
Unload Bedload Sacks	0.2673	160.5	7.0	1.495	\$0.047	\$0.013
Unload loose in OTR	0.6025	21.7	94.5	1.495	\$0.026	\$0.016
Unload OWC	0.1302	21.7	40.1	1.495	\$0.061	\$0.008
Dump Sacks	0.2673	107.4	7.0	1.495	\$0.070	\$0.019
Move Containers from Dock	1.0000	29.3	64.0	1.839	\$0.035	\$0.035
Sort Parcels	1.0000	444.1	1.0	1.684	\$0.134	\$0.134

**Model Cost \$1.424**

**Sources**

- Column [1] Attachment C, page 3 (arrival and dispatch profiles)
- Column [2] Attachment C, page 2 (units per workhour)
- Column [3] Attachment C, page 6 (conversion factors)
- Column [4] Attachment C, page 4 (piggyback factors)
- Column [5] (TY wage rate \* column [4]) / (column [2] \* column [3])
- Column [6] (column [1] \* column [5])

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**Intra-BMC Non-machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.383</b>
Move Containers to Dock	0.3849	29.3	8.3	1.839	\$0.268	\$0.103
Load Containers	0.3849	10.8	8.3	1.839	\$0.726	\$0.279
<b>Origin SCF</b>						<b>\$1.591</b>
Unload Containers <sup>2</sup>	1.0000				\$0.191	\$0.191
Crossdock containers	1.0000	7.3	8.3	1.839	\$1.073	\$1.073
Bedload NMOs	0.0400	183.9	1.0	1.495	\$0.287	\$0.011
Load NMOs in OTRs	0.7250	10.8	19.5	1.495	\$0.251	\$0.182
Load NMOs in OWCs	0.2220	10.8	8.3	1.495	\$0.590	\$0.131
Load NMOs on Pallets	0.0130	13.9	19.2	1.495	\$0.197	\$0.003
<b>Destination BMC</b>						<b>\$1.519</b>
Unload Bedloaded NMOs	0.0400	168.0	1.0	1.664	\$0.350	\$0.014
Unload NMOs in OTRs	0.7250	21.7	19.5	1.664	\$0.139	\$0.101
Unload NMOs in OWC	0.2220	21.7	8.3	1.664	\$0.328	\$0.073
Unload NMOs on Pallets	0.0130	12.8	19.2	1.664	\$0.240	\$0.003
Move IHCs (from bedload)	0.0165	14.7	15.6	1.567	\$0.242	\$0.004
Move OTRs	0.2988	14.7	19.5	1.567	\$0.194	\$0.058
Move OWC	0.0915	14.7	8.3	1.567	\$0.457	\$0.042
Move Pallets	0.0054	14.7	19.2	1.567	\$0.197	\$0.001
D Primary NMO Sort	1.0000	68.7	1.0	1.633	\$0.842	\$0.842
Move IHCs	0.0405	14.7	18.4	1.567	\$0.206	\$0.008
Move OTRs	0.1681	14.7	19.5	1.567	\$0.194	\$0.033
Move OWC	0.0078	14.7	8.3	1.567	\$0.457	\$0.004
Move Pallets	0.3098	14.7	19.2	1.567	\$0.197	\$0.061
Bedload from IHC	0.1291	183.9	1.0	1.664	\$0.320	\$0.041
Load NMOs in OTRs	0.5363	10.8	19.5	1.664	\$0.279	\$0.150
Load NMOs in OWC	0.0248	10.8	8.3	1.664	\$0.657	\$0.016
Load NMOs on Pallet	0.3098	13.9	19.2	1.664	\$0.220	\$0.068
<b>Destination SCF</b>						<b>\$1.052</b>
Unload Bedload to IHC	0.1291	160.5	1.0	1.495	\$0.329	\$0.043
Unload OTRs	0.5363	21.7	19.5	1.495	\$0.125	\$0.067
Unload OWC	0.0248	21.7	8.3	1.495	\$0.295	\$0.007
Unload Pallet	0.3098	12.8	19.2	1.495	\$0.216	\$0.067
Move IHC	0.1291	14.7	15.6	1.495	\$0.231	\$0.030
Move OTRs	0.5363	14.7	19.5	1.495	\$0.185	\$0.099
Move OWC	0.0248	14.7	8.3	1.495	\$0.436	\$0.011
Move Pallet	0.3098	14.7	19.2	1.495	\$0.188	\$0.058
Manual Sort	1.0000	356.7	1.0	1.359	\$0.135	\$0.135
Move IHC	0.2673	14.7	15.6	1.495	\$0.231	\$0.062
Move OTRs	0.6025	14.7	19.5	1.495	\$0.185	\$0.112
Move OWC	0.1302	14.7	8.3	1.495	\$0.436	\$0.057
Bedload NMOs	0.2673	183.9	1.0	1.495	\$0.287	\$0.077
Load OTRs w/ loose	0.6025	10.8	19.5	1.495	\$0.251	\$0.151
Load Hampers:OWC	0.1302	10.8	8.3	1.495	\$0.590	\$0.077
<b>Destination Delivery Unit</b>						<b>\$0.506</b>
Unload Bedload NMOs	0.2673	160.5	1.0	1.495	\$0.329	\$0.088
Unload loose in OTR	0.6025	21.7	19.5	1.495	\$0.125	\$0.075
Unload OWC	0.1302	21.7	8.3	1.495	\$0.295	\$0.038
Move Containers from Dock	1.0000	29.3	13.1	1.839	\$0.170	\$0.170
Sort Parcels	1.0000	444.1	1.0	1.684	\$0.134	\$0.134

<b>Model Cost</b>	<b>\$5.050</b>
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Column [1]: Attachment C, page 3 (arrival and dispatch profiles)  
 Column [2]: Attachment C, page 2 (units per workhour)  
 Column [3]: Attachment C, page 6 (conversion factors)  
 Column [4]: Attachment C, page 4 (piggyback factors)  
 Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
 Column [6]: (column [1] \* column [5]).

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5.

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**Intra-BMC Non-machinable Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$1.093</b>
Move Containers to Dock	0.3849	29.3	2.9	1.839	\$0.767	\$0.295
Load Containers	0.3849	10.8	2.9	1.839	\$2.074	\$0.798
<b>Origin SCF</b>						<b>\$4.501</b>
Unload Containers <sup>2</sup>	1.0000				\$0.521	\$0.521
Crossdock containers	1.0000	7.3	2.9	1.839	\$3.067	\$3.067
Bedload NMOs	0.0400	183.9	1.0	1.495	\$0.287	\$0.011
Load NMOs in OTRs	0.7250	10.8	6.8	1.495	\$0.716	\$0.519
Load NMOs in OWCs	0.2220	10.8	2.9	1.495	\$1.686	\$0.374
Load NMOs on Pallets	0.0130	13.9	6.7	1.495	\$0.564	\$0.007
<b>Destination BMC</b>						<b>\$3.028</b>
Unload Bedloaded to IHC	0.0400	160.5	1.0	1.664	\$0.367	\$0.015
Unload NMOs in OTRs	0.7250	21.7	6.8	1.664	\$0.399	\$0.289
Unload NMOs in OWC	0.2220	21.7	2.9	1.664	\$0.938	\$0.208
Unload NMOs on Pallets	0.0130	12.8	6.7	1.664	\$0.686	\$0.009
Move IHC	0.0400	14.7	6.4	1.567	\$0.587	\$0.023
Move OTR	0.7250	14.7	6.8	1.567	\$0.556	\$0.403
Move OWC	0.2220	14.7	2.9	1.567	\$1.307	\$0.290
Move Pallet	0.0130	14.7	6.7	1.567	\$0.563	\$0.007
D. Primary NMO Sort	1.0000	68.7	1.0	1.633	\$0.842	\$0.842
Move IHC	0.0125	14.7	6.4	1.567	\$0.587	\$0.007
Move OTR	0.2273	14.7	6.8	1.567	\$0.556	\$0.126
Move OWC	0.0696	14.7	2.9	1.567	\$1.307	\$0.091
Move Pallet	0.0130	14.7	6.7	1.567	\$0.563	\$0.007
Bedload from IHC	0.1291	183.9	1.0	1.664	\$0.320	\$0.041
Load NMOs in OTRs	0.5363	10.8	6.8	1.664	\$0.798	\$0.428
Load NMOs on Pallet	0.3098	13.9	6.7	1.664	\$0.628	\$0.195
Load NMOs in OWC	0.0248	10.8	2.9	1.664	\$1.877	\$0.047
<b>Destination SCF</b>						<b>\$2.494</b>
Unload Bedload to IHC	0.1291	160.5	1.0	1.495	\$0.329	\$0.043
Unload OTRs	0.5363	21.7	6.8	1.495	\$0.358	\$0.192
Unload Pallet	0.3098	12.8	6.7	1.495	\$0.616	\$0.191
Unload OWC	0.0248	21.7	2.9	1.495	\$0.843	\$0.021
Move IHC	0.1291	14.7	6.4	1.495	\$0.560	\$0.072
Move OTRs	0.5363	14.7	6.8	1.495	\$0.530	\$0.284
Move Pallet	0.3098	14.7	6.7	1.495	\$0.537	\$0.166
Move OWC	0.0248	14.7	2.9	1.495	\$1.247	\$0.031
Manual Sort	1.0000	356.7	1.0	1.359	\$0.135	\$0.135
Move IHC	0.2673	14.7	6.4	1.495	\$0.560	\$0.150
Move OTRs	0.6025	14.7	6.8	1.495	\$0.530	\$0.319
Move OWC	0.1302	14.7	2.9	1.495	\$1.247	\$0.162
Bedload NMOs	0.2673	183.9	1.0	1.495	\$0.287	\$0.077
Load OTRs w/ loose	0.6025	10.8	6.8	1.495	\$0.716	\$0.432
Load Hampers/OWC	0.1302	10.8	2.9	1.495	\$1.686	\$0.219
<b>Destination Delivery Unit</b>						<b>\$1.015</b>
Unload Bedload NMOs	0.2673	160.5	1.0	1.495	\$0.329	\$0.088
Unload loose in OTR	0.6025	21.7	6.8	1.495	\$0.358	\$0.216
Unload OWC	0.1302	21.7	2.9	1.495	\$0.843	\$0.110
Move Containers from Dock	1.0000	29.3	4.7	1.839	\$0.468	\$0.468
Sort Parcels	1.0000	444.1	1.0	1.684	\$0.134	\$0.134
<b>Model Cost</b>						<b>\$12.132</b>

**Sources**

Column [1] Attachment C, page 3 (arrival and dispatch profiles)  
Column [2] Attachment C, page 2 (units per workhour)  
Column [3] Attachment C, page 6 (conversion factors)  
Column [4] Attachment C, page 4 (piggyback factors)  
Column [5] (TY wage rate \* column [4]) / (column [2] \* column [3])  
Column [6] (column [1] \* column [5])

<sup>1</sup> Number of Handlings at Origin AO from Attachment C, page 5

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy

**RBMC Machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.205</b>
Move Containers to Dock	1.0000	29.3	40.1	1.839	\$0.055	\$0.055
Load Containers	1.0000	10.8	40.1	1.839	\$0.150	\$0.150
<b>Origin SCF</b>						<b>\$0.346</b>
Unload Containers <sup>2</sup>	1.0000				\$0.043	\$0.043
Crossdock containers	1.0000	7.3	40.1	1.839	\$0.221	\$0.221
Bedload Sacks	0.0434	190.1	7.0	1.495	\$0.040	\$0.002
Bedload loose	0.0696	183.9	1	1.495	\$0.287	\$0.020
Load Sacks in OTRs	0.1152	10.8	112.0	1.495	\$0.044	\$0.005
Load Loose in OTRs	0.5108	10.8	94.5	1.495	\$0.052	\$0.026
Load Pallets	0.0160	13.9	106.8	1.495	\$0.036	\$0.001
Load Pallet Boxes	0.0090	13.9	134.7	1.495	\$0.028	\$0.000
Load OWCs	0.2360	10.8	40.1	1.495	\$0.122	\$0.029
<b>Destination BMC</b>						<b>\$0.354</b>
Unload Bedload Sack	0.0434	194.8	7.0	1.664	\$0.043	\$0.002
Unload Bedload Loose	0.0696	648.5	1.0	1.664	\$0.091	\$0.006
Unload Sacks in OTR	0.1152	21.7	112.0	1.664	\$0.024	\$0.003
Unload loose in OTR	0.5108	21.7	94.5	1.664	\$0.029	\$0.015
Unload Pallet	0.0160	12.8	106.8	1.664	\$0.043	\$0.001
Unload Pallet Boxes	0.0090	12.8	134.7	1.664	\$0.034	\$0.000
Unload Other Wheeled Cont	0.2360	21.7	40.1	1.664	\$0.068	\$0.016
Dump OTR of sacks	0.1152	6.5	112.0	1.567	\$0.077	\$0.009
Dump OTR of loose	0.5108	6.5	94.5	1.567	\$0.091	\$0.046
Dump Pallet	0.0160	6.5	106.8	1.567	\$0.080	\$0.001
Dump Pallet Boxes	0.0090	6.5	134.7	1.567	\$0.064	\$0.001
Dump Other Wheeled Cont.	0.2360	6.5	40.1	1.567	\$0.214	\$0.050
Sack Sorter	0.1586	348.3	7.0	2.346	\$0.034	\$0.005
Sack shakeout	0.1586	72.3	7.0	1.567	\$0.110	\$0.017
PPSM	0.9736	744.9	1.0	2.068	\$0.098	\$0.096
SPSM	0.2482	1664.3	1.0	4.923	\$0.105	\$0.026
Move Pallets	1.0000	14.7	134.7	1.567	\$0.028	\$0.028
Load Pallet Boxes	1.0000	13.9	134.7	1.664	\$0.031	\$0.031

<b>Model Cost</b>	<b>\$0.905</b>
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**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup>Assumption that all RBMC will be entered at origin AO.

<sup>2</sup>Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**RBMC Non-machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$0.994</b>
Move Containers to Dock	1.0000	29.3	8.3	1.839	\$0.268	\$0.268
Load Containers	1.0000	10.8	8.3	1.839	\$0.726	\$0.726
<b>Origin SCF</b>						<b>\$1.591</b>
Unload Containers <sup>2</sup>	1.0000				\$0.191	\$0.191
Crossdock containers	1.0000	7.3	8.3	1.839	\$1.073	\$1.073
Bedload NMOs	0.0400	183.9	1.0	1.495	\$0.287	\$0.011
Load NMOs in OTRs	0.7250	10.8	19.5	1.495	\$0.251	\$0.182
Load NMOs in OWCs	0.2220	10.8	8.3	1.495	\$0.590	\$0.131
Load NMOs on Pallets	0.0130	13.9	19.2	1.495	\$0.197	\$0.003
<b>Destination BMC</b>						<b>\$1.403</b>
Unload Bedloaded NMOs	0.0400	168.0	1.0	1.664	\$0.350	\$0.014
Unload NMOs in OTRs	0.7250	21.7	19.5	1.664	\$0.139	\$0.101
Unload NMOs in OWC	0.2220	21.7	8.3	1.664	\$0.328	\$0.073
Unload NMOs on Pallets	0.0130	12.8	19.2	1.664	\$0.240	\$0.003
Move IHCs (from bedload)	0.0165	14.7	15.6	1.567	\$0.242	\$0.004
Move OTRs	0.2988	14.7	19.5	1.567	\$0.194	\$0.058
Move OWC	0.0915	14.7	8.3	1.567	\$0.457	\$0.042
Move Pallets	0.0054	14.7	19.2	1.567	\$0.197	\$0.001
D Primary NMO Sort	1.0000	68.7	1.0	1.633	\$0.842	\$0.842
Move Pallets	1.0000	14.7	19.2	1.567	\$0.197	\$0.197
Load NMOs on Pallet	0.3098	13.9	19.2	1.664	\$0.220	\$0.068
<b>Model Cost</b>						<b>\$3.988</b>

**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).  
Column [2]: Attachment C, page 2 (units per workhour).  
Column [3]: Attachment C, page 6 (conversion factors).  
Column [4]: Attachment C, page 4 (piggyback factors).  
Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
Column [6]: (column [1] \* column [5]).

<sup>1</sup> Assumption that all RBMC will be entered at origin AO.

<sup>2</sup> Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

**RBMC Non-machinable Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO<sup>1</sup></b>						<b>\$2.841</b>
Move Containers to Dock	1.0000	29.3	2.9	1.839	\$0.767	\$0.767
Load Containers	1.0000	10.8	2.9	1.839	\$2.074	\$2.074
<b>Origin SCF</b>						<b>\$4.501</b>
Unload Containers <sup>2</sup>	1.0000				\$0.521	\$0.521
Crossdock containers	1.0000	7.3	2.9	1.839	\$3.067	\$3.067
Bedload NMOs	0.0400	183.9	1.0	1.495	\$0.287	\$0.011
Load NMOs in OTRs	0.7250	10.8	6.8	1.495	\$0.716	\$0.519
Load NMOs in OWCs	0.2220	10.8	2.9	1.495	\$1.686	\$0.374
Load NMOs on Pallets	0.0130	13.9	6.7	1.495	\$0.564	\$0.007
<b>Destination BMC</b>						<b>\$3.086</b>
Unload Bedloaded to IHC	0.0400	160.5	1.0	1.664	\$0.367	\$0.015
Unload NMOs in OTRs	0.7250	21.7	6.8	1.664	\$0.399	\$0.289
Unload NMOs in OWC	0.2220	21.7	2.9	1.664	\$0.938	\$0.208
Unload NMOs on Pallets	0.0130	12.8	6.7	1.664	\$0.686	\$0.009
Move IHC	0.0400	14.7	6.4	1.567	\$0.587	\$0.023
Move OTR	0.7250	14.7	6.8	1.567	\$0.556	\$0.403
Move OWC	0.2220	14.7	2.9	1.567	\$1.307	\$0.290
Move Pallet	0.0130	14.7	6.7	1.567	\$0.563	\$0.007
D. Primary NMO Sort	1.0000	68.7	1.0	1.633	\$0.842	\$0.842
Move Pallet	1.0000	14.7	8.0	1.567	\$0.473	\$0.473
Load NMOs on Pallet	1.0000	13.9	8.0	1.664	\$0.528	\$0.528
<b>Model Cost</b>						<b>\$10.428</b>

**Sources**

Column [1]: Attachment C, page 3 (arrival and dispatch profiles).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors)

Column [4]: Attachment C, page 4 (piggyback factors)

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

<sup>1</sup>Assumption that all RBMC will be entered at origin AO.

<sup>2</sup>Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.



**RDU Non-machinable Mail Processing Cost Model**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO</b>						<b>\$0.402</b>
Sort by Shipper ID	1.0000	444.1	1.0	1.684	\$0.134	\$0.134
Move Containers to Dock	1.0000	29.3	8.3	1.839	\$0.268	\$0.268
Load Containers	0.0000	10.8	8.3	1.839	\$0.726	\$0.000
<b>Model Cost</b>						<b>\$0.402</b>

Column [1]: All RDU parcels will be sorted to shipper and moved to dock (USPS-T-1, Section VII).

Column [2]: Attachment C, page 2 (units per workhour).

Column [3]: Attachment C, page 6 (conversion factors).

Column [4]: Attachment C, page 4 (piggyback factors).

Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).

Column [6]: (column [1] \* column [5]).

**RDU Oversize Mail Processing Cost Model**  
**Length plus Girth Between 108" and 130"**

	[1] # handlings	[2] units/hr	[3] conversion	[4] piggyback	[5] \$ per oper.	[6] \$ per facility
<b>Origin AO</b>						<b>\$0.901</b>
Sort by Shipper ID	1.0000	444.1	1.0	1.684	\$0.134	\$0.134
Move Containers to Dock	1.0000	29.3	2.9	1.839	\$0.767	\$0.767
Load Containers	0.0000	10.8	2.9	1.839	\$2.074	\$0.000
<b>Model Cost</b>						<b>\$0.901</b>

**Sources**

- Column [1]: All RDU parcels will be sorted to shipper and moved to dock (USPS-T-1, Section VII).  
Column [2]: Attachment C, page 2 (units per workhour).  
Column [3]: Attachment C, page 6 (conversion factors).  
Column [4]: Attachment C, page 4 (piggyback factors).  
Column [5]: (TY wage rate \* column [4]) / (column [2] \* column [3]).  
Column [6]: (column [1] \* column [5]).

## Storage Cost Estimates

	Mail Category			
	Machinable	Non-Machinable	Oversize	
# of pieces in Container (Pallet Box)	134.7	19.9	6.7	1/
Total Square Feet taken up by one container	13.3	13.3	13.3	2/
Cost of Space (\$/sf) - Annual	\$20.788	\$20.788	\$20.788	3/
Space Variability	1.000	1.000	1.000	4/
Space Support Factor	1.354	1.354	1.354	5/
Cost of Space (\$/sf) - Annual	\$28.153	\$28.153	\$28.153	6/
Cost per square foot - Daily (303 days)	\$0.093	\$0.093	\$0.093	7/
Cost per Container	\$1.239	\$1.239	\$1.239	8/
Cost per piece per day	\$0.009	\$0.062	\$0.184	9/
<b>Storage Days Required</b>				
RBMC	1.834	1.834	1.834	10/
RDU	5.000	5.000	5.000	11/
<b>Cost by PRS Rate Category</b>				
RBMC	\$0.017	\$0.114	\$0.338	12/
RDU	\$0.046	\$0.311	\$0.922	13/

### Sources

- 1/: Attachment C, page 6 (Conversion factors).
- 2/: Calculation using dimensions of containers.
- 3/: Docket No. R2005-1, PRC-LR-6, file "PRC MPPG TY06.XLS", worksheet G2, cell E43.  
Note: This value appears to be incorrect. The calculation should include building and leasehold depreciation (as well as rents, utilities, and other facilities space-related costs). The PRC calculation on sheet G2 has erroneously included equipment depreciation, rather than building and leasehold depreciation. When this error is corrected, the value becomes \$17,277.
- 4/: Variability assumption implicit in data filed in Docket No. R2001-1.
- 5/: Docket No. R94-1, LR-G-120A, Schedule 5, page 1, line 39 and Schedule 4, page 1, line 44.
- 6/: (3) x (4) x (5)
- 7/: (6) / 303 days.
- 8/: (2) x (7).
- 9/: (8) / (1)
- 10/: August 2005 BMC PRS Survey
- 11/: Assumption from Product Definition (mailers must pick up RDU parcels every 5 days).
- 12/: (9) x (10).
- 13/: (9) x (11).

## Transportation Cost Estimate Summary

PRS Rate Category	Benchmark	Total Cost Impact per Cubic Foot [1]	Average Cubic Feet per Piece [2]	Total Cost Impact per Piece [3]
RBMC - Machinable	Intra-BMC	(\$2.218)	0.425	(\$0.942)
RBMC - Non-machinable	Intra-BMC	(\$2.218)	2.777	(\$6.160)
RBMC - Oversize	Intra-BMC	(\$2.218)	7.938	(\$17.604)
RDU - Machinable	Intra-BMC Local	(\$2.449)	0.425	(\$1.040)
RDU - Non-machinable	Intra-BMC Local	(\$2.449)	2.777	(\$6.802)
RDU - Oversize	Intra-BMC Local	(\$2.449)	7.938	(\$19.440)

### Sources

[1]. Attachment E, page 2.

[2]. Attachment C, page 5.

[3] [1] x [2].

## Transportation Cost Difference Estimates

### Assumed Legs of Transportation [1]

		Local	Intermediate	Long Distance
Intra-BMC	[1a]	1.951	1.947	0.000
RBMC	[1b]	1.000	1.000	0.000
RDU	[1c]	0.000	0.000	0.000

### Benchmark Transportation Cost per Cubic Foot [2]

Zone	Intra-BMC			Total
	Local	Intermediate	Long Distance	
Local	\$1.238	\$1.211	N/A	\$2.449
1-2	\$2.134	\$2.422	N/A	\$4.555
3	\$2.134	\$2.422	N/A	\$4.555
4	\$2.134	\$2.422	N/A	\$4.555
5	\$2.134	\$2.422	N/A	\$4.555
6	N/A	N/A	N/A	N/A
7	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A

### PRS Transportation Cost per Cubic Foot [3]

Zone	RBMC (Intra-BMC)				RDU (Intra-BMC)			
	Local	Intermediate	Long Distance	Total	Local	Intermediate	Long Distance	Total
Local	\$0.635	\$0.622	N/A	\$1.257	\$0.000	\$0.000	N/A	\$0.000
zone 1-2	\$1.094	\$1.244	N/A	\$2.338	\$0.000	\$0.000	N/A	\$0.000
3	\$1.094	\$1.244	N/A	\$2.338	\$0.000	\$0.000	N/A	\$0.000
4	\$1.094	\$1.244	N/A	\$2.338	\$0.000	\$0.000	N/A	\$0.000
5	\$1.094	\$1.244	N/A	\$2.338	\$0.000	\$0.000	N/A	\$0.000
6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### PRS Transportation Cost Impact per Cubic Foot [4]

Zone	RBMC (Intra-BMC)				RDU (Intra-BMC)			
	Local	Intermediate	Long Distance	Total	Local	Intermediate	Long Distance	Total
Local	(\$0.604)	(\$0.589)	N/A	(\$1.192)	(\$1.238)	(\$1.211)	N/A	(\$2.449)
1-2	(\$1.040)	(\$1.178)	N/A	(\$2.218)	(\$2.134)	(\$2.422)	N/A	(\$4.555)
3	(\$1.040)	(\$1.178)	N/A	(\$2.218)	(\$2.134)	(\$2.422)	N/A	(\$4.555)
4	(\$1.040)	(\$1.178)	N/A	(\$2.218)	(\$2.134)	(\$2.422)	N/A	(\$4.555)
5	(\$1.040)	(\$1.178)	N/A	(\$2.218)	(\$2.134)	(\$2.422)	N/A	(\$4.555)
6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### Sources

[1]: Assumed average number of legs of transportation

[1a]: Docket No. R2005-1, USPS LR-K-113, Attachment B, page 9

[1b]: RBMC will travel from origin AO to origin SCF (1 local leg) and from origin SCF to origin BMC (1 intermediate leg).

[1c]: Since mailers pick up RDU at origin AO, it will not incur any transportation legs.

[2]: Docket No. R2005-1, USPS LR-K-113, Attachment B, page 11

[3]: Ratio of PSRS Rate Category transportation legs {1b&1c} to benchmark [1a] multiplied by benchmark cost [2].

[4]: PSRS transportation cost per cubic foot [3] minus benchmark transportation cost per cubic foot [2].

### Scanning Cost Estimates

PRs Rate Category	Transaction Time (hours) [1]	Wage Rate [2]	Piggyback Factor [3]	Cost per active scan [4]	Number of active scans [5]	Scan Cost [6]
RBMC - Machinable	0.0007	\$35.371	1.592	\$0.038	0	\$0.000
RBMC - Non-machinable	0.0007	\$35.371	1.592	\$0.038	0	\$0.000
RBMC - Oversize	0.0007	\$35.371	1.592	\$0.038	0	\$0.000
RDU - Machinable	0.0007	\$35.371	1.592	\$0.038	2	\$0.077
RDU - Non-machinable	0.0007	\$35.371	1.592	\$0.038	2	\$0.077
RDU - Oversize	0.0007	\$35.371	1.592	\$0.038	3	\$0.115

#### Sources

- [1]: Docket No. R2000-1, USPS-T-30, Section A, Data Sheet A-8  
 [2]: Attachment C, page 4. Premium Pay Adjusted Wage Rate.  
 [3]: Docket No. R2005-1, PRC-LR-6, file "PRC MPPG TY06.XLS", worksheet A, cell M49  
 [4]: [1] x [2] x [3]. Follows methodology shown in Docket No. R2001-1 LR-J-135.  
 [5]: Assumption taken from USPS product description.  
 [6]: [4] x [5].

## Postage Due Cost Estimates

RBMC	Value
Average Time per piece (minutes)	6.018 1/
Average Time per piece (hours)	0.100 2/
Wage Rate	\$35.371 3/
Piggyback Factor	1.378 4/
Postage Due Cost (for sampled parcels)	\$4.890 5/
Sampling Ratio	1.5% 6/
Postage Due Cost (for all parcels)	\$0.073 7/
 RDU	 \$0.000 8/

### Sources

- 1/: Attachment H, page 4, column 7
- 2/: (1) / 60 minutes.
- 3/: Attachment C, page 4
- 4/: Docket No. R2005-1, PRC-LR-6, file "PRC MPPG TY06.XLS", worksheet A, cell M37
- 5/: (2) x (3) x (4)
- 6/: Attachment G, page 2
- 7/: (5) x (6)
- 8/: Assumed to be insignificant postage due costs since information from the scanned barcodes will generate a daily postage due manifest.

## Postage Due Sampling Ratio

### USPS Sample Size by Volume Range [1]

Volume		Pieces
Lower Bound	Upper Bound	
1	19	All pieces
20	99	20 % of pieces
100	199	15 % of pieces
200	299	10% of pieces
300	1,999	30 pieces
2,000	3,999	40 pieces
4,000	5,999	50 pieces
6,000	7,999	60 pieces
8,000	9,999	70 pieces
10,000	99,999	100 pieces
100,000	499,999	150 pieces
500,000	up	200 pieces

### Daily Return Volume (5-day week) [2]

BMC	Pieces	Sample Size	Sampling Ratio
	[2]	[3]	[4]
Site A	2,500	40	1.6%
Site B	3,200	40	1.3%
Site C	1,100	30	2.7%
Site D	2,200	40	1.8%
Site E	4,400	50	1.1%
Total	13,400	200	1.5%

#### Sources

- [1]: Supplied by the Business Mailer's Support HQ division.  
 [2]: Average returns per BMC per 5-day week.  
 Data collected by Marketing for existing customer  
 Data was collected in the Fall of 2002.

**Postage Due**

USPS Return Technician	Location A [1]										
	A	B	C	D	E	F	G	H	I	J	K
Pieces	30	30	30	30	30	30	30	30	30	30	30
Set Up	25	15	15	15	6	15	15	20	20	20	15
Selecting Samples	15	15	50	30	3	7	1	2	2	30	10
Weighing / Recording Samples	35	10	15	30	18	60	33	20	67	25	25
Matching Worksheet to Manifest	80	120	100	120	--	95	45	25	105	165	55
Validating Postage Statement to Manifest											
Transferring Postage Statement to Post Office											
Other (explanation)		135 meeting									
<b>Post Office Tasks</b>											
Permit System Entry of Postage Due	5	5	5	5	15	15	10	--	15	5	5
<b>TOTAL</b>											

**Sources**

[1] through [4]: Data collected directly through survey.

[5]: Only includes volume when have entered data.

[6]: Sum of each row.

[7]: [6] / [5].

**Postage Due**

	Location B [2]								
	A	B	C	D	E	F	G	H	I
<b>USPS Return Technician</b>									
Pieces	30	30	30	30	30	30	30	30	30
Set Up	2	2	5	2	3	2	2	2	2
Selecting Samples	10	6	14	6	7	8	8	8	4
Weighing / Recording Samples	20	35	9	21	20	30	20	28	16
Matching Worksheet to Manifest	25	21	30	22	27	25	28	25	18
Validating Postage Statement to Manifest	5	4	9	6	8	5	6	5	4
Transferring Postage Statement to Post Office	5	5	5	6	5	5	36	5	4
Other (explanation)									
<b>Post Office Tasks</b>									
Permit System Entry of Postage Due	5	8	7	15	15	10	5	5	15
<b>TOTAL</b>									

**Sources**

[1] through [4]: Data collected directly through s

[5]: Only includes volume when have entered d

[6]: Sum of each row.

[7]: [6] / [5].

**Postage Due**

USPS Return Technician	Location C [3] <sup>1</sup>							
	A	B	C	D	E	H <sup>2</sup>	I	J
Pieces	45	40	45	50	50	80	40	40
Set Up	5	10	15	5	20	5	10	10
Selecting Samples	10	10	10	15	10	20	5	10
Weighing / Recording Samples	35	30	30	30	25	120	35	30
Matching Worksheet to Manifest	30	30	30	30	30	30	30	30
Validating Postage Statement to Manifest								
Transferring Postage Statement to Post Office								
Other (explanation)	10 travel	5 travel	10 travel	10 travel	10 travel			
<b>Post Office Tasks</b>								
Permit System Entry of Postage Due	10	10	15	10	30			
<b>TOTAL</b>								

**Sources**

- [1] through [4] Data collected directly through :
- [5] Only includes volume when have entered d
- [6] Sum of each row.
- [7] [6] / [5].

**Postage Due**

USPS Return Technician	Location D [4]												
	A	B	C	D	E	F	G	H	I	J	K	L	M
Pieces	30	30	30	30	30	30	30	30	30	30	30	30	30
Set Up	55	35	25	25	30	30	21	29	30	31	30	20	30
Selecting Samples	34	30	~	31	45	25	34	~	63	45	33	32	40
Weighing / Recording Samples	38	28	35	85	70	55	87	65	65	70	37	85	75
Matching Worksheet to Manifest	80	70	70	95	75	67	92	75	80	75	65	90	105
Validating Postage Statement to Manifest	30	40	35	35	35	18	38	50	20	20	20	35	32
Transferring Postage Statement to Post Office													
Other (explanation)													

**Post Office Tasks**

Permit System Entry of Postage Due

**TOTAL**

**Sources**

[1] through [4]: Data collected directly through s

[5]: Only includes volume when have entered d

[6]: Sum of each row.

[7]: [6] / [5].

Postage Due	Time		
	Volume	Total	Per piece
<b>USPS Return Technician</b>	[5]	[6]	[7]
Pieces			
Set Up	1380	674	0.488
Selecting Samples	1320	738	0.559
Weighing / Recording Samples	1380	1667	1.208
Matching Worksheet to Manifest	1350	2410	1.785
Validating Postage Statement to Manifest	660	460	0.697
Transferring Postage Statement to Post Office	270	76	0.281
Other	260	180	0.692
(explanation)			
<b>Post Office Tasks</b>			
Permit System Entry of Postage Due	800	245	0.306
<b>TOTAL</b>			<b>6.018</b>

**Sources**

- [1] through [4]: Data collected directly through e
- [5]: Only includes volume when have entered d
- [6]: Sum of each row.
- [7]: [6] / [5].

**RESPONSE OF UNITED STATES POSTAL SERVICE  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**

7. Please refer to the cost sheets that were supplied with the supplemental response to OCA/USPS-13 and 15, attachment C, page 4. The value listed in cell C34 for the "Proportion sent from secondary to primary due to SSIU" is 3.0%. (SSIU = parcel singulators.) This percentage is calculated by taking the product of two assumptions, which are listed directly above it ("Probability that barcode on secondary will not be readable," and, "Proportion of parcel singulators (SSIU) being at secondary"). However, according to PRC-LR-9, "PPfinaladj.xls", sheet "Other Inputs", the proportion sent from the secondary to primary due to SSIU is 0.0%. Since these sheets are supposed to reflect PRC methodology, please confirm that 0.0% should have been used and revise the sheets accordingly. If not confirmed, please explain why the value found in PRC-LR-9 should not be used.

**RESPONSE:**

Confirmed. It should be noted that the cost results do not change when the value of cell C34 in attachment C, page 4 is changed to 0.0%.

## Attachment to response to POIR No. 1, question 7

PRC Version  
Attachment C  
Page 4 of 15  
REVISED 12/21/05

**Piggyback Factors, Wages, Mail Flow Operating Assumptions**

<b>Wage Rate with Premium Pay Factor Applied</b>	\$35.371	1/
<b>Premium Pay Factor</b>	0.989	2/
<b>TY Other mail processing wage rate</b>	\$35.772	3/
<b>Window Service Adjustment Factor</b>	1.075	4/
Window Service Base year wage rate	33.804	5/
Window Service Test year wage rate	36.344	6/
<b>Mail Processing Operation Specific Piggyback Factors</b>		
NMO Sorting at BMC	1.633	7/
Other Operations at BMCs	1.567	7/
Platform BMC	1.664	7/
Primary Parcel Sorting Machine	2.068	7/
Secondary Parcel Sorting Machine	4.923	7/
Sack Sorting Machine - BMC	2.346	7/
NMO Sorting at SCF	1.359	7/
Platform Non-BMC	1.495	7/
NonMODS Allied	1.839	7/
NonMODSMANP	1.684	7/
Window Service Piggyback factor (Parcel Post)	1.129	8/
<b>Mail Flow Operating Assumptions</b>		
Percent with direct transportation to destinating delivery unit from BMC	12.3%	9/
Percent Sorted to 5-Digits by Primary Parcel Sorting Machine	20.1%	10/
Destinating BMCs will feed barcoded destinating mail unfiltered to secondary	20.8%	11/
Probability that mail fed directly to nonspecific secondary will receive more than one sort	50.0%	12/
Probability that barcode on secondary will not be readable	3.0%	13/
Proportion of parcel singulators (SSIU) being at secondary	100.0%	14/
Proportion sent from secondary to primary due to SSIU	0.0%	15/
Probability of inter-BMC parcel going to primary psm at destination BMC	83.4%	16/
Probability of inter-BMC parcel being handled by SSIU in destination BMC	94.5%	17/
Probability of intra BMC and DBMC parcels going to primary psm (or get keyed)	100.00%	18/
Probability of Intra BMC and DBMC on secondary psm	79.9%	19/
Probability that NMOs will NOT be inducted on the conveyor system (not used for NMOs over 10)	41.2%	20/
Probability that NMOs will be NOT be moved using towveyor (not used for pallets)	31.4%	20/
Probability that PRS machinable mail pieces are processed on the PPSM	97.4%	21/
Probability that PRS machinable mail pieces are processed on the SPSM	24.8%	21/

**Sources**

- 1/ (2) x (3)
- 2/ Docket No R2005-1, USPS-LR-K-55
- 3/ Docket No R2005-1, USPS-LR-K-55
- 4/ (6) / (5)
- 5/ Docket No R2005-1, USPS-LR-K-55
- 6/ Docket No R2005-1, USPS-LR-K-55
- 7/ Docket No R2005-1, PRC-LR-9
- 8/ Docket No R2005-1, PRC-LR-9
- 9/ USPS LR-PCR-40, page 64
- 10/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [10]
- 11/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [9]
- 12/ Assumption that mail going to secondary PSM will be evenly split between scheme 1 and scheme 2.
- 13/ Assumption used by Operations
- 14/ Assumption used by Operations
- 15/ (14) x (15)
- 16/  $[1 - (12)] + [(16) \times (12)] + [(1) - (12)] \times [(1) - (11)] \times (16) + [(11) \times (12) \times [(1) - (16)]]$
- 17/  $(12) + [(11) \times (13)] + [1 - (12)] \times [(1) - (11)]$
- 18/  $1 + [1 - (11)] \times (16)$
- 19/  $1 - (11)$
- 20/ Docket R2001-1, USPS LR-J-64, Attachment J, page 1, [11]