

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

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SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES, 2010

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Docket No. N2010-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO MEDCO WITNESS THOMAS MORIARTY  
(USPS/MEDCO-T1-1 THROUGH T1-15)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service hereby directs the following interrogatories and requests for the production of documents to Medco witness Thomas Moriarty:  
(MEDCO-T-1): USPS/MEDCO-T1-1 through T1-15.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-1.**

Please refer to your testimony at page 2, ¶ 3. Please provide annual data for the past five fiscal years reflecting the systemwide error rates associated with Medco's "virtually error-free" dispensing operation. Please provide comparable national industry-wide error rate data separately for "traditional retail pharmacy" and "hospital operations" systems.

### **USPS/MEDCO-T1-2.**

Please refer to page 2, ¶ 4 of your testimony. There, you assert that various stakeholders "will" experience "severe negative consequences" if Saturday mail delivery to street addresses is eliminated.

- (a) Provide all documents related to any quantitative and qualitative analysis conducted by or for Medco that provide the basis for your assertion regarding the "severe negative consequences" that "will" be experienced by "[c]ompanies of all sizes".
- (b) Please provide all documents relating to any quantitative and qualitative analysis conducted by or for Medco that provide the basis for your assertion regarding "severe negative consequences" that "will" affect "[t]he USPS' bottom line".
- (c) Please provide all documents related to any quantitative and qualitative analysis conducted by or for Medco that provide the basis for your assertion regarding the "severe negative consequences" that "will" be experienced by "Americans . . . in rural communities".

### **USPS/MEDCO-T1-3.**

At page 3, ¶ 2 of your testimony, you discuss the degree of medical patient (prescription recipient) reliance on different forms of prescription fulfillment, such as mail order vs. retail pharmacy. For fiscal years 2006 through 2009, please provide all data in Medco's possession regarding the relationship between a patient's reliance on different forms of prescription fulfillment (such as mail order vs. retail pharmacy) and such factors as the patient's:

- household income level;
- private health insurance enrollment;
- lack of health insurance coverage;
- level of formal educational attainment.

## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-4.**

Please refer to your testimony at page 3, ¶ 3. For each of the past five years, please provide data regarding the relationship between medication adherence and such factors as the patient's:

- household income level;
- private health insurance enrollment;
- lack of health insurance coverage;
- level of formal educational attainment.

### **USPS/MEDCO-T1-5.**

Please refer to page 3, ¶ 2 of your testimony.

- (a) Please identify all non-postal shippers (postal competitors) on whom Medco has relied during the past five fiscal years for the delivery of "life-saving and life-enhancing" medicines to addressees.
- (b) Of all the 5-digit ZIP Code areas in the United States to which Medco shipped medicines in fiscal years 2008 and 2009, please identify which ZIP Codes are ones in which postal competitors identified in response to subpart (a) do not provide delivery service and in which Medco relies exclusively upon the Postal Service for all deliveries.
- (c) Of the 5-digit ZIP Codes identified in response to subpart (b), please identify all in which postal competitors "often contract out to local USPS facilities for delivery."
- (d) Please quantify the total percentage of Medco medicine shipments to patients that are tendered to postal competitors referenced in subpart (c) and contracted out to local USPS facilities for delivery.

### **USPS/MEDCO-T1-6.**

Putting aside the postal product/class under which Medco prescription fulfillment packages enter the mail stream via Open and Distribute arrangements, please indicate the percentage of Medco prescription fulfillment mail pieces that are delivered by the Postal Service to the recipient/patient via each of the following products/services:

- (a) Express Mail;
- (b) Priority Mail;
- (c) First-Class Mail;
- (d) Standard Mail.

## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-7.**

Please fully explain the extent to which: (a) recipients of Medco shipments may elect to have a shipment delivered to their address via one of the mail products identified in USPS/MEDCO-T1-6; and (b) the choice of postal product for delivery to the patient is governed by contractual arrangements between Medco and the recipient's health insurance carrier or other entity.

### **USPS/MEDCO-T1-8.**

For each mail product identified in response USPS/MEDCO-T1-6, based on the applicable USPS service standard from origin to destination, please provide data indicating the percentage of Medco medicine shipments for which the expected delivery day currently is:

- (a) Monday;
- (b) Tuesday;
- (c) Wednesday;
- (d) Thursday;
- (e) Friday;
- (f) Saturday;
- (c) Sunday.

### **USPS/MEDCO-T1-9.**

What percentage of Medco's prescription fulfillment shipments are delivered to Post Office boxes? What portion of these shipments are tendered by Medco to postal competitors but are ultimately delivered by the USPS because they are addressed to Post Office boxes?

### **USPS/MEDCO-T1-10.**

Please refer to page 3, ¶ 4 of your testimony. Please describe the negative impact that 50 percent of Medco patients "would" experience if Saturday mail delivery to street addresses were eliminated.

### **USPS/MEDCO-T1-11.**

Please fully describe all methods Medco employs to remind recipients of prescription medicines about upcoming refills. In your response, indicate the percentage of patients for whom each method (and any combination of methods) is employed, the number of times that reminders are routinely sent to a patient in reference to a particular prescription refill. Also indicate the number of calendar days between the date on which the recipient's supply of medicine is expected to be depleted and the date on which each reminder is typically sent.

## **USPS Interrogatories to Medco witness Moriarty**

### **USPS/MEDCO-T1-12.**

- (a) Please fully describe all Medco systems in place to receive patient prescription refill requests (e.g., via e-mail, telephone, letter, fax).
- (b) For each system identified in response to subpart (a), please indicate the average number of calendar days from receipt of refill request until the entry of the refill in the mail stream.

### **USPS/MEDCO-T1-13.**

For each patient reminder method or combination of methods discussed in response to USPS/MEDCO-T1-11, please indicate the number of calendar days it takes for Medco to receive responses from:

- (a) 50 percent of reminder recipients;
- (b) 75 percent of reminder recipients;
- (c) 95 percent of reminder recipients.

Please also separately quantify any response rate differences for patients in “rural” and “underserved” communities, as those terms are used at page 3, ¶ 2 of your testimony.

### **USPS/MEDCO-T1-14**

For the past two fiscal years, on a monthly basis, please indicate the percentage of Medco patients who, when placing a refill order, indicated to Medco that their supply of the requested medication was (a) depleted at the time of their refill request or (b) within a week of being depleted.

### **USPS/MEDCO-T1-15**

Please fully describe any Medco prescription refill systems under which a set number of refills are automatically or periodically mailed to a patient in accordance with a pre-determined schedule.