

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Premium Forwarding Service)

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ABDULKADIR M. ABDIRAHMAN (OCA/USPS-T3-19-20)
January 18, 2005

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

Kenneth E. Richardson
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T3-19. Please refer to the “Premium Forwarding Service Cost Analysis,” appended to your testimony, at 2, n. 6. Note 6 reads “LR-J-69 Table 5.2.5.4 N8.” Table 5.2.5.4 displays “Cost Per Piece for UAA Mail Forwarded with Postage Due and Delivered at Call Window.” Row 2, Column A, of Table 5.2.5.4 presents the “Hours/Piece” for “Collection of Postage Due” at a Call Window.”

- (a) Please confirm that a Call Window is generally used by business customers whose mailings tend to involve multiple pieces of mail, sometimes a very large volume of mail . See e.g., USPS-LR-J-172, Office of Inspector General Report Number AC-AR-01-001, at 1 (footnote omitted): “Many high-volume mail customers purchase post office box service, which separates mail by post office box number and allows mail pick-up during the hours the box lobby is open. When mail volume exceeds the largest installed box size, caller service enables the customer to pick up mail at a post office call window.” If you do not confirm, please explain.
- (b) Please provide the documentation and results of the 2-week study that are the basis of the hours/piece figure that you use, i.e., the study described in Table 5.2.5.4, note 1.
- (c) What was the average transaction time (hours/transaction) time observed in the cited study for collection of postage due at the call window?
- (d) What was the average number of pieces per transaction for collection of postage due at the call window observed in the study?

OCA/USPS-T3-20. Please refer to the “Premium Forwarding Service Cost Analysis,” appended to your testimony, at 2, n. 7. Note 7 cites LR-J-69 Table 5.2.1.1, Row 2, for

the “Hours/Piece” to process Change –of-Address cards. In turn, note 4 of Table 5.2.1.1 references Handbook M-39, “Management of Delivery Services Handbook,” for the 2 minutes to process Change-of-Address cards. Please provide a copy of the most recent version of Handbook M-39.