

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-T3-1-5)
November 29, 2004

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,

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OCA/USPS-T3-1. Please refer to your testimony at page 2, line 3, where you indicate all of the costs for PFS are volume variable. Please explain whether you characterize the costs of training carriers, clerks and SSAs (Sales and Service Associates) as volume variable. If those costs are not volume variable, how are those costs accounted for by the Postal Service and how will they be considered in determining the cost of PFS?

OCA/USPS-T3-2. Please refer to your testimony at page 3 where you state that you have used the collection cost of 2 cents for postage due at a call window as a proxy for the PFS prepayment cost. Please explain why you did not use the cost of collection of post office box fees as a proxy for PFS prepayment costs since that process seems more likely to involve payment by personal check or credit card (as does the PFS prepayment) rather than the postage due collection process which seems likely to involve a high percentage of less costly cash transactions.

OCA/USPS-T3-3. If you had used the cost of collecting post office box fees as the proxy for PFS prepayment cost, what cost would you have calculated? Please provide the detail of the calculation similar to that on page 2 of the attachment to your testimony.

OCA/USPS-T3-4. Please calculate the Postal Service's labor cost of an individual transaction if a check or a credit card is used to pay a PFS fee.

OCA/USPS-T3-5. Please refer to your testimony at page 4 where you indicate that you undertook field observations of informal reshipment services conducted at small, medium and large delivery units.

- (a) Please indicate when, where, and how many times at each size operation you observed these informal reshipment services.

- (b) Did the postal service employees preparing the mail for reshipment ever use two or more boxes to reship the mail?
- (c) How did the Postal Service employees preparing the mail for reshipment determine the size or sizes of the Priority Mail box used for reshipment?
- (d) Did the Postal Service employees preparing the mail for reshipment ever use non-Priority Mail boxes or fashion a large box for reshipment?
- (e) Do you agree that, if two or more Priority Mail boxes are required for a customer, additional employee time would be required to fill and label the additional Priority Mail box?
- (f) If you answer part (d), above, is in the affirmative, would the cost of that additional time be the same cost as you show for the first box in your cost study on page 3 of the attachment to your testimony under "Labor Cost: Repackaging" and "Labor Cost: Carrier filling out the label" of \$1.75 for repackaging plus \$0.76 for labeling for the second box and for each additional box?