

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

Experimental Priority Mail Flat-Rate Box)

Docket No. MC2004-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS THOMAS M. SCHERER (OCA/USPS-T1-17-20)
June 21, 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. The instructions included with interrogatories OCA/USPS-T1-1-17 are incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

Emmett Rand Costich
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819
e-mail: costicher@prc.gov

OCA/USPS-T1-17. Witness Barrett states at page 7 of his testimony that Flat-Rate Priority Mail packages may be picked up by a carrier from a home or business. Please provide estimates of the average FY 2003 costs (in dollars or hours) of the following activities:

- a. A curbline carrier's conducting an accountable transaction
- b. A park-and-loop carrier's conducting an accountable transaction
- c. A foot carrier's conducting an accountable transaction
- d. An average carrier's conducting an accountable transaction
- e. A curbline carrier's picking up a package
- f. A park-and-loop carrier's picking up a package
- g. A foot carrier's picking up a package
- h. An average carrier's picking up a package.
- i. If any requested average FY 2003 cost (in dollars or time) is not known, please confirm that the cost is greater than zero. If you do not confirm, please explain.

OCA/USPS-T1-18. Witness Barrett states at page 7 of his testimony that Flat-Rate Priority Mail packages may be picked up by a carrier from a home or business.

- a. What proportion of carrier stops and/or deliveries involved an accountable transaction in FY 2003?
- b. What was the average cost of a carrier stop and/or delivery involving an accountable transaction in FY 2003?

- c. If the requested average FY 2003 cost (in dollars or time) of an accountable transaction is not known, please confirm that the cost is greater than zero. If you do not confirm, please explain.
- d. What proportion of carrier stops and/or deliveries in FY 2003 involved picking up a package?
- e. What was the average cost of a carrier stop and/or delivery in FY 2003 involving picking up a package?
- f. If the requested average FY 2003 cost (in dollars or time) of a package pick-up is not known, please confirm that the cost is greater than zero. If you do not confirm, please explain.

OCA/USPS-T1-19. Witness Barrett states at page 7 of his testimony that Flat-Rate Priority Mail packages may be picked up by a carrier from a home or business.

- a. Please confirm that the fee for scheduled pick-up of a package is \$12.50. If you cannot confirm, please provide the correct fee.
- b. What is the average FY 2003 cost (in dollars or time) of a scheduled package pick-up?
- c. If the requested average FY 2003 cost (in dollars or time) of a scheduled package pick-up is not known, please confirm that the cost is greater than zero. If you do not confirm, please explain.

OCA/USPS-T1-20. Witness Barrett states at page 7 of his testimony that Flat-Rate Priority Mail packages may be picked up by a carrier from a home or business.

- a. Please confirm that the Postal Service offers from its website a package pick-up service for which no fee is charged. If you do not confirm, please explain.
- b. What is the average cost (in dollars or time) of the free package pick-up service?
- c. If the requested average cost (in dollars or time) of a free package pick-up is not known, please confirm that the cost is greater than zero. If you do not confirm, please explain.