

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

Premium Forwarding Service

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Docket No. MC2007-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ B. HOPE
(OCA\SPS -T1-1-6)
(August 10, 2007)

. 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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 901 New York Ave., N.W. Suite 200, Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-1). Specifically, "the party shall make the claim expressly and shall describe the

nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-T1-1. The following interrogatory refers to your testimony at page 4. You state: “Standard Mail® parcels that do not require a scan or signature at delivery....”

Please refer to the Signature Confirmation fee schedule 949.¹ Please explain under what circumstance Standard Mail parcels would require a signature at delivery.

OCA/USPS-T1-2. At page 4 of your testimony, you refer to the weekly Priority Mail shipment sent to customers using the Premium Forwarding Service (PFS). Are all PFS shipments being sent to clients on Wednesday? If not, please fully explain why not and provide the day(s) of the week PFS shipments are made and for each day identified, provide the percent of total USPS PFS weekly volume sent on that day.

OCA/USPS-T1-3. In your testimony you discuss a qualitative survey of PFS customers, lines 19-20 at 9. You also provide a copy of the survey instrument and discuss the results.

- a. Please provide the underlying statistical justification including relevant calculations for the use of 1,007 surveys and the expected statistical reliability.
- b. Please indicate the degree to which the 205 completed surveys are statistically reliable and representative of the universe of PFS customers.
- c. Please comment on the response rate and provide any information you have to explain why only 205 of 1,007 questionnaires received responses.

¹ See also, <http://www.usps.com/send/waystosendmail/extraservices/signatureconfirmationservice.htm>

OCA/USPS-T1-4. In your testimony you discuss a qualitative survey of PFS customers, lines 19-20 at 9. You also provide a copy of the survey instrument and discuss the results.

- a. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 2.
- b. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for each of the parts of question 3.
- c. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 5.
- d. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for each of the parts of question 6.
- e. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 7.
- f. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 12.
- g. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 13.
- h. Please provide the breakout in terms of number of replies by category (e.g., excellent, very good, etc) for question 14.
- i. Please provide the written comments received associated with questions 4, 8, 11, and 15.

OCA/USPS-T1-5. Please turn to the Second Data Collection Report for the Premium Forwarding Service, April 1, 2006 – September 31, 2006 (Q3-Q4 FY 2006) (Attachment 1 to your testimony). Please explain the statement on page 2, “A distribution of PFS volume (shipments) by zone for FY 2006 was estimated by recording information from over 15,600 sampled application forms.” Please explain the basis for the sampling, including statistical reliability and degree to which the sample is representative of the universe from which it is drawn.

OCA/USPS-T1-6. Please turn to the Second Data Collection Report for the Premium Forwarding Service, April 1, 2006 – September 31, 2006 (Q3-Q4 FY 2006) (Attachment 1 to your testimony). In item 5 on page 2 there is a summary of major issues discussed: the replacement of the previous informal forwarding arrangements, concerns about timely delivery of weekly shipments, concern over the inclusion of Standard Mail in the shipment, concern over the inability to apply from a remote location, and concern over the inability to change the destination address during the service, concern over the lack of an option of additional or fewer shipments per week, and concern over the inability to send PFS shipments to international addresses.

- a. Please quantify the number of customers expressing each type of concern.
- b. Please provide the total number of customers queried as to whether they had concerns.