

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BRADFORD GROUP

Docket No. MC2007-4

REVISED RESPONSES OF POSTAL SERVICE WITNESS PARR
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22)
(November 16, 2007)

The United States Postal Service hereby provides the revised responses of witness Parr to the following interrogatories of the Office of the Consumer Advocate, filed on September 6, 2007: OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22. The original responses to these interrogatories were filed on September 20, 2007, and were revised on September 21 to include a proper header on each page.

The above-referenced interrogatories have been the subject of a pending Joint Motion for protective conditions. Bradford Group, the Postal Service's co-proponent in this docket, is now willing to have these responses and the corresponding workpaper filed publicly. Thus, the parties have today moved to withdraw the initial Joint Motion for protective conditions for these two interrogatories in response to Commission Order No. 44.

The original responses to OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22 simply referred to the pending motion for protective conditions. The revised responses, which are attached, now refer to the Excel file "Table 1 (MC2007-4)." This Excel file is

also attached to today's filing. No other changes have been made.

Each interrogatory is stated verbatim and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-19. Please refer to your testimony, Appendix A, page 3, and the column entitled "Revenue per piece (1)." Also, please refer to Appendix B, page B-2, where it states, "the revenue calculations use prices which took effect May 14, 2007."

- a. Please confirm that the "prices [rates] which took effect May 14, 2007," for Standard Mail letters in the Regular Automation Categories (Rate Schedule 321B) are \$0.252, \$0.238, \$0.233, and \$0.218 for Mixed AADC, AADC, 3-Digit, and 5-Digit, respectively. If you do not confirm, please explain.
- b. Please confirm that the "Revenue per piece" figures shown in column (1) include Destination Entry Discounts. If you do not confirm, please explain.
- c. Please show all calculations used to derive the "Revenue per piece" figures shown in column (1), and provide citations to all figures used in such calculations.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. See the attached file "Table 1 (MC2007-4)."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-20. Please refer to your testimony, Appendix A, page 3, which presents the volumes for the Bradford Group's Standard Mail Regular letters in the column entitled "Volume (2)." Please provide electronic workpapers showing the development of the "Volume" figures for letters shown in column (2). Also, please provide citations to all figures used.

RESPONSE:

See the attached file "Table 1 (MC2007-4)."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-21. Please refer to your testimony, Appendix A, page 5, and the column entitled "Revenue per piece (1)." Also, please refer to Appendix B, page B-2, where it states, "the revenue calculations use prices which took effect May 14, 2007."

- a. Please confirm that the "prices [rates] which took effect May 14, 2007," for Standard Mail flats in the Regular Nonautomation Categories (Rate Schedule 321A) are \$0.515, \$0.461, \$0.427, and \$0.363 for Mixed AADC, AADC, 3-Digit, and 5-Digit, respectively. If you do not confirm, please explain.
- b. Please confirm that the "Revenue per piece" figures shown in column (1) for nonautomation flats include Destination Entry Discounts. If you do not confirm, please explain.
- c. Please provide electronic workpapers showing the development of the "Revenue per piece" figures for nonautomation flats shown in column (1). Also, please provide citations to all figures used.
- d. Please confirm that the "prices [rates] which took effect May 14, 2007," for Standard Mail flats in the Regular Automation Categories (Rate Schedule 321B) are \$0.477, \$0.424, \$0.392, and \$0.335 for Mixed AADC, AADC, 3-Digit, and 5-Digit, respectively. If you do not confirm, please explain.
- e. Please confirm that the "Revenue per piece" figures shown in column (1) for automation flats include Destination Entry Discounts. If you do not confirm, please explain.
- f. Please provide electronic workpapers showing the development of the "Revenue per piece" figures for automation flats shown in column (1). Also, please provide citations to all figures used.
- g. Please confirm that the "prices [rates] which took effect May 14, 2007," for Standard Mail Enhanced Carrier Route flats (Rate Schedule 322) is \$0.249, for Basic. If you do not confirm, please explain.
- h. Please confirm that the "Revenue per piece" figure shown in column (1) for Enhanced Carrier Route flats includes Destination Entry Discounts. If you do not confirm, please explain.
- i. Please provide electronic workpapers showing the development of the "Revenue per piece" figure for Enhanced Carrier Route flats shown in column (1). Also, please provide citations to all figures used.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. See the attached file "Table 1 (MC2007-4)."
- d. Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

- e. Confirmed.
- f. See the attached file "Table 1 (MC2007-4)."
- g. Confirmed.
- h. Confirmed.
- i. See the attached file "Table 1 (MC2007-4)."

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-22. Please refer to your testimony, Appendix A, page 5, which presents the volumes for the Bradford Group's Standard Mail Regular and ECR flats in the column entitled "Volume (2)." Please provide electronic workpapers showing the development of the "Volume" figures for flats shown in column (2). Also, please provide citations to all figures used.

RESPONSE:

See the attached file "Table 1 (MC2007-4)."