

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

Repositionable Notes Market Test)

Docket No. MC2004-5

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DARRON K. HOLLAND (OCA/USPS-T1- 9 - 12)
(July 30, 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-T1-1-8, dated July 29, 2004, are hereby incorporated by reference

Respectfully submitted,

SHELLEY S. DREIFUSS
Director
Office of the Consumer Advocate

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

OCA/USPS-T1-9. Please refer to page 1 of USPS-LR-1. The Report of Opinion Research Corporation includes a statement that small and medium-sized flats mailers are less likely to purchase RPNs at any price due to the costs of printing, materials, and affixing RPNs, as well as the incremental postage fee. Please provide a comparison of RPNs attached to letters, as opposed RPNs attached to flats, with respect to the following factors:

- a. cost of printing
- b. cost of materials
- c. cost of affixing the RPNs
- d. Are the factors listed in parts a. – c. of the instant interrogatory also an important concern for large mailers? If not, why not?
- e. Please describe the differing production processes for printing and attaching RPNs to letters versus flats.

OCA/USPS-T1-10. Please refer to page 5 of USPS-LR-1. In the second paragraph, 3M is referred to as the “Postal Service[’s] RPN Program partner.”

- a. Please describe the nature of the partnership relationship.
- b. Is the Postal Service-3M relationship an exclusive partnership? If not, identify the other partners. If so, then why was 3M selected on an exclusive basis?

OCA/USPS-T1-11. Please refer to page 5 of USPS-LR-1. The list of industries targeted for business focus groups include: financial services, telecommunications, travel/hospitality, pharmaceutical industry, retail, manufacturing, business services, and

non-profit organizations. Why were these businesses targeted? What other types of businesses were thought to be unsuited to the use of RPNs, and why?

OCA/USPS-T1-12. Please refer to page 6 of USPS-LR-1. A reference is made to the "USPS RPN Pilot Program."

- a. What were the starting and ending dates for the USPS RPN Pilot Program?
- b. How did a company qualify for participation in the USPS RPN Pilot Program?
- c. Was there a limit on the number of companies that could participate in the USPS RPN Pilot Program? Please explain.