

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE OCA (OCA/USPS-51) -- ERRATA  
(June 16, 2005)

The United States Postal Service hereby revises its partial responses to the following interrogatory of the OCA, filed on May 13, 2005: OCA/USPS-51. The attached pages replace the response filed on June 2, and are filed to address concerns raised in the OCA's motion to compel regarding the broader set of questions 43-54.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

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June 16, 2005

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TO INTERROGATORIES OF THE OCA**

OCA/USPS-51. Please re-submit Attachment 1 to the Postal Service's response to interrogatory OCA/USPS-239, Docket No. R2001-1, dated December 17, 2001, with additional columns for all quarters since QIII, FY 2001, through the most recent quarter.

- a. What is the "SEDS" umbrella suite of services that is cited in footnote 1 of the attachment?
- b. Please list every discrete service in the "SEDS" umbrella suite of services.
- c. For every discrete service in the "SEDS" umbrella suite of services provide the following (please provide the information requested below separately for PostECS; and Electronic Postmark):
  - i. Provide a detailed description of the service.
  - ii. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
  - iii. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
  - iv. On what date was this service first offered to the public?
  - v. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
  - vi. Provide a description of the primary purchasers of the service.
  - vii. Provide a complete description of the activities performed by the Postal Service in providing the service.
  - viii. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
  - ix. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
  - x. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
  - xi. Submit all of the annual revenues earned by the Postal Service in providing the service.
  - xii. Submit annual volume figures for each service, by billing determinant.
  - xiii. Submit annual net income (loss) figures for the service since the service was first made available to the public.
  - xiv. Submit total revenues for the service for the entire period since the service was first made available to the public.

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- xv. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- xvi. Submit total net income (loss) figures for the service since the service was first made available to the public.
- xvii. Give a precise citation in the current filing for every figure submitted in parts j. – p.
- xviii. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- xix. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

**RESPONSE:**

A partial objection was filed on May 23, 2005. See, however, the attachments provided in response to OCA/USPS-53, which include updated information on EPM, which is the only service relevant to this question which operated in the base year in this proceeding. To fill the gap between the earlier information provided on EPM in response to OCA/USPS-239 (R2001-1), and the FY02-FY04 information provided in OCA/USPS-53, full year FY01 EPM expenses were \$4,556 thousand, and revenues were \$173 thousand.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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