

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. NEEDHAM
(OCA/USPS-T8-29-34)
(July 23, 1996)

Pursuant to sections 25 and 26 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 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney

POSTAL RATE COMMISSION
DOCKET
JUL 27 1996
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OCA/USPS-T-8-29. Please provide updated workpapers comparable to witness Larson's Docket No. R90-1, USPS-T-22, WP-7.

OCA/USPS-T-8-30. The second Mail Insurance Survey, at LR-SSR-109, Part II, p. 112, contains the statement, "[i]f they (the respondents) ask a suggested price tell them approximately \$.90 per \$100 in value or 1% of the value."

- a. On what basis was \$.90 chosen? Were indemnity analyses performed? Please explain.
- b. Were other prices considered? Why or why not?

OCA/USPS-T-8-31. A comparison of your proposed indemnity fees for insurance at pages 45-48 of your testimony and of your proposed registry fees at p. 16 shows a difference of \$38.05 in the fees for \$5,000 of insurance.

- a. Do you believe that your proposed insurance fees are a reasonable alternative to the proposed registry fees for the same size and weight parcel?
- b. Explain why or why not.

OCA/USPS-T-8-32. What are the delivery standards for registered mail? Please provide the most recent available delivery statistics, including but not limited to average days to deliver,

separately, by overnight, one-day, two-day, three-day, and four-day delivery area. Do any registry items typically require more than four days to deliver? Explain.

OCA/USPS-T-8-33. Who are the major users of certified mail, i.e., types of businesses, individuals? Provide a percentage breakdown by type of user.

OCA/USPS-T-8-34. Who are the major users of return receipt mail, i.e., types of businesses, individuals? Provide a percentage breakdown by type of user.

Docket No. MC96-3

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney

Washington, D.C. 20268-0001
July 23, 1996