

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T400-45-48)

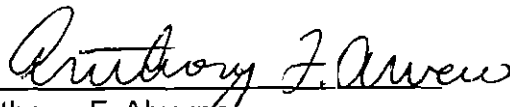
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: (USPS/OCA-T400-45-48).

Respectfully submitted,

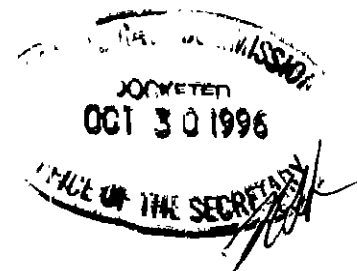
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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October 30, 1996



USPS/OCA-T400-45.

- a. Please confirm that in Docket No. R94-1, the OCA proposed a 23-cent card rate for both postal and post cards. If you are unable to confirm, please explain.
- b. What cost coverage did the OCA propose for the postal and postcard subclass in Docket No. R94-1? Please show all calculations.
- c. What would have been the implicit cost coverage for postal cards if the OCA proposed rates had been adopted pursuant to Docket No. R94-1? Please show all calculations.
- d. Did the OCA propose that postal cards be priced as a separate subclass in Docket No. R94-1?
- e. Please provide citations to OCA testimony in Docket No. R94-1 in support of the 23-cent card rate for postal and postcards.

USPS/OCA-T400-46. Please refer to your response to USPS/OCA-T400-4 and exhibits accompanying that response. For purposes of this interrogatory, the term "enhanced service" refers to non-merchandise return receipt service for which signature, date, and address is requested under the present DMCS, and "basic service" refers to nonmerchandise return receipt service for which only signature and date is requested under the present DMCS.

- a. Confirm that your proposal would result in a reduction in the fee for enhanced service from \$1.50 to \$1.10.

- b. Please refer to the OCA version of USPS-T-1 WP D. Does your estimate of the volume of return receipts account for the reduction in the fee for enhanced service?
- c. If your response to (b) is negative, please provide revised workpapers reflecting the volume effect resulting from the fees you propose.
- d. In general, what would you expect the effect on a product's volume to be when a reduction in the product's fee is proposed?

USPS/OCA-T400-47. Please refer to your response to USPS/OCA-T100-6(c), redirected from witness Sherman.

- a. Assuming that a "well documented explanation in the record showing exactly the errors committed by Postal Service witnesses Larson and Foster in the two previous omnibus rate cases" is provided in this docket, would you be in favor of a proposal to raise the certified mail fee in this docket if that explanation established that certified mail costs exceeded certified mail revenues (excluding ancillary service revenues) in the TY under rates recommended by the Commission and implemented by the Governors? If your response is negative, please explain why you insist upon such an explanation.
- b. Is it your belief that witness Foster committed errors in Docket No. R94-1 with respect to the certified mail fee proposal? If so, please identify what you believe those errors are.

USPS/OCA-T400-48. Please refer to your response to USPS/OCA-T400-7(a).

- a. If a rate or fee proposal is defined as a change in the rate or fee of a rate category (as opposed to a subclass), have you ever submitted testimony in support of a rate or fee proposal for which the cost coverage, or the implicit cost coverage, as the case may be, was less than 100 percent? Please identify all such proposals. You may confine your answer to all Commission proceedings beginning after Docket No. R84-1.
- b. If a rate or fee proposal is defined as a change to the rate or fee of a rate category (as opposed to a subclass), has the OCA ever submitted testimony in support of a rate or fee proposal for which the cost coverage, or the implicit cost coverage, as the case may be, is less than 100 percent? Please identify all such proposals. You may confine your answer to all Commission proceedings beginning after Docket No. R84-1.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


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