

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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Docket No. MC2000-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: JOSEPH M. POELLNITZ (OCA/USPS-T2-1-2)
(December 17, 1999)

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 OCA/USPS-T1-1-6 to witness Lee Garvey dated December 10, 1999, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN

Director

Office of the Consumer Advocate

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Attorney

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OCA/USPS-T2-1. Please refer to your testimony at pages 7 and 9, footnotes 11 and 18, and the testimony of witness Seckar (USPS-T-2) in Docket No. MC98-1.

- a. Please explain the significance of, and the rationale for, your decision to "make no assumptions about MOL volume allocation between sites."
- b. Does your decision produce superior results to that of witness Seckar in Docket No. MC98-1? Please explain.

OCA/USPS-T2-2. Please refer to your testimony and the testimony of witness Seckar (USPS-T-2) in Docket No. MC98-1. Please identify any assumptions or methodological approaches in your testimony that are different from the assumptions made or methodological approaches used by witness Seckar in Docket No. MC98-1 (other than the assumption identified in OCA/USPS-T2-1, above). Please explain the significance of, and your rationale for, any changes identified.

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 12 of the rules of practice.

Stephanie Wallace

Washington, D.C. 20268-0001
December 17, 1999