

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CHRIS F. CAMPBELL (OCA/USPS-T29-1-9)
January 24, 2000

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-1-15 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN

Director

Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T29-1. Please refer to Figure 1 on page 8 of your testimony. The mail flow diagramed here begins at the incoming primary. Other than the boxes marked "BRAMAS Operation" and "Postage Due Unit," are there any differences in operations between the advance deposit BRM mail flow and that of an identical mail piece with a stamp instead of the BRM indicia?

OCA/USPS-T29-2. Please respond to OCA/USPS-T29-1 for Figure 2 on page 12 of your testimony.

OCA/USPS-T29-3. Please respond to OCA/USPS-T29-1 for QBRM.

OCA/USPS-T29-4. Please refer to LR-I-160, Section L and to the Commission's Opinion and Recommended Decision, Docket No. R97-1, paragraph [5198], pages 326-327. The Commission's observation was that single-piece mail that would benefit from proposed discounts for PRM and QBRM consisted of mailpieces that were already mostly barcoded and already generating cost savings. Did you consider using courtesy reply mail as a benchmark for QBRM instead of hand written mail? Please explain fully.

OCA/USPS-T29-5. Prior to the incoming primary, are there any operational cost differences between a QBRM mailpiece and an identical mailpiece which has a stamp applied? Please explain fully.

OCA/USPS-T29-6. Other than the 8.9 percent you have assumed as post office box destination, what proportion of QBRM is destined for firm holdout, i.e., avoids carrier delivery?

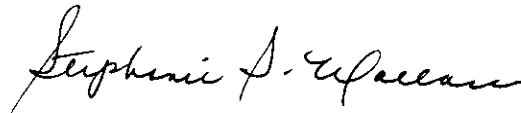
OCA/USPS-T29-7. Other than the 8.9 percent you have assumed as post office box destination, what proportion of handwritten mail is destined for firm holdout, i.e., avoids carrier delivery?

OCA/USPS-T29-8. The Postal Service proposed and the Commission recommended a 75 percent passthrough of the cost savings for QBRM. Please confirm that your proposal passes through 90 percent (3.378×0.90) of the cost savings you calculated. What changes occurred between R97-1 and R2000-1 that have caused you to increase the proposed percent of passthrough?

OCA/USPS-T29-9. Assume an individual returns a QBRM piece, but mistakenly places a First-Class stamp on the mailpiece. Please describe all processing differences and cost differences which would result.

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.

A handwritten signature in black ink, appearing to read 'Stephanie S. Wallace', is written over a horizontal line.

Stephanie S. Wallace

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January 24, 2000