

UNITED STATES OF AMERICA
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
(OCA/USPS-38-52)
January 28, 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-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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Director
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OCA/USPS-38. Has the Postal Service updated the 1980 Nonhousehold Mailstream Study? If so, please provide a copy. If not, has the Postal Service conducted any studies, reviews, estimates, approximations, research or analysis addressing the non-household mail-stream? If so, please provide copies of all related documents. If not, please explain why none has been conducted.

OCA/USPS-39. For FY 97, FY 98 and FY 99, please provide the volume of single-piece First-Class Mail that was FIM tagged. If you are unable to provide the volume, please explain.

OCA/USPS-40. What proportion of courtesy reply envelopes processed by the Postal Service in FY 97, FY 98 and FY 99, had a FIM C? What proportion of courtesy reply envelopes processed by the Postal Service in FY 97, FY 98 and FY 99 had a FIM D? If you are unable to provide the information, please explain.

OCA/USPS-41. For FY 97, FY 98 and FY 99, for First-, Periodicals and Standard A class mail, please provide separate presort, nonpresort CEM and nonpresort non-CEM barcode reader reject rates caused by each of the following:

- (a) shifts in the window envelope's address insert,
- (b) mail pieces are too flimsy,
- (c) pieces have open edges,
- (d) pieces have "other physical problems" (please specify each problem), and
- (e) pieces have a non-delivery point sequence address.

OCA/USPS-42. Please refer to Docket No. R97-1, OCA/USPS-103. For each of the following years: FY 97, FY 98 and FY 99, please provide similar ODIS single-piece volume data.

OCA/USPS-43. For FY 97, FY 98 and FY 99, please update the information provided in Docket No. R97-1, in response to OCA/USPS-60 regarding advance and non-advance deposits.

OCA/USPS-44. For FY 97, FY 98 and FY 99, please update the Origin-Destination Information System data for the percentage of mail by shape for each class/rate category, provided in Docket No. R97-1, in response to OCA/USPS-61.

OCA/USPS-45. For each of the following years: FY 97, FY 98 and FY 99, please provide a copy of Table 194 from the Household Diary Study, for both holiday and nonholiday mail.

OCA/USPS-46. Please refer to Docket No. R97-1, Postal Service exhibits, USPS-RT-11B in Tr. 35 at 18595, USPS-RT-11C in Tr. 35 at 18592, USPS-RT-11E at 18598, USPS-RT-11F (Final Adjustments) and USPS-RT-11G in Tr. 35 at 18600. Please provide all changes that would be necessary to reflect actual FY 99 Postal Service results. Include in your response, the changes needed to complete the roll forward for FY 2000 and FY 2001.

OCA/USPS-47. For each of the following stamps, please provide (1) the number of stamps printed and distributed for sale; (2) the cost of printing the stamps; (3) the cost of distributing the stamps; and (4) the number of stamps sold:

- (a) F rate make-up stamp,
- (b) G rate make-up stamp, and
- (c) H rate make-up stamp,

OCA/USPS-48. Does the Postal Service have any studies, reviews, estimates, approximations, or other data or information about the number or value of make-up

stamps (F rate, G rate, and/or H rate) purchased by the public that were actually used for postage? If not, why not? Provide all related documents.

OCA/USPS-49. Does the Postal Service have any studies, reviews, estimates, approximations, or other data or information about the number or value of stamps left unused in the hands of the public as a result of the change in the First Class Mail rates in January 1999 (i.e., 32 cent stamps, 23 cent stamps, etc.)? If not, why not? Provide all related documents.

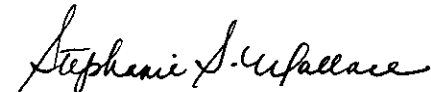
OCA/USPS-50. Please identify all USPS incremental costs associated with the change in the single piece First Class Mail rates in January 1999, such as advertising, public information, stamp production and distribution, window time, overtime, customer call center expense, collection of postage due, etc. Provide all related documents.

OCA/USPS-51. Did the Postal Service conduct any review or analysis of the process of changing First Class Mail rates in January 1999? If not, why not? Provide all related documents.

OCA/USPS-52. For the period 1995 to the present, please identify any instance in which the Postal Service provided stamps to individuals without charge (such as in connection with completion of a questionnaire, a courtesy program, as a promotion, etc.). Do not include equal value exchanges of stamps. For each such instance, please explain the terms under which stamps were provided, including the number and value of stamps provided, and the location or area involved. Provide all related documents.

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 S. Wallace

Washington, D.C. 20268-0001
January 28, 2000