

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  
WITNESS: DAVID R. FRONK (OCA/USPS-T33-1-3)  
February 1, 2000

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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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OCA/USPS-T33-1. Please refer to Table 3 on page 9 of your testimony and the percentages you cited from the "Household Diary Study: Fiscal Year 1998."

- (a) Would you agree that for fiscal year 1998, the volume of First-Class Mail generated by households was 14.9 billion pieces (0.148 X 100.434 billion)?
- (b) The 1999 RPW shows 54.3 billion pieces of single-piece First-Class Mail for fiscal year 1998. Is it the case that about 39.4 (54.3-14.9) billion pieces of single-piece First-Class Mail were generated by nonhouseholds? Please explain.
- (c) Please provide any documents which reconcile the percentages in the "Household Diary Study: Fiscal Year 1998" with actual volumes of First-Class Mail.

OCA/USPS-T33-2. Please refer to your testimony on page 6, where you discuss the "Household Diary Study: Fiscal Year 1998" and to the following table.

Year	Total First Class	Household Diary Percentages	Number of Pieces
1987	78,869	21.30%	16,799
1997	99,660	16.30%	16,245
1998	100,434	14.80%	14,864

- (a) In looking at Table 4-1 of LR-I-116 would you agree that during the period 1987 to 1998, volume growth in First-Class Mail has been generated by nonhouseholds? Please explain any negative answer.
- (b) Do you believe that increases in the single-piece First-Class Mail rate during this period have contributed to the decline (21.3 percent to 14.8 percent or 16.8 billion pieces to 14.8 billion pieces) in the percentage and absolute volume of First-Class Mail generated by households?

(c) Are there other factors that you believe led to the decline in household generated First-Class Mail? Please explain.

OCA/USPS-T33-3. Your Table 3 indicates that First-Class Mail revenue is declining as a percentage of total domestic mail revenue.

(a) Do you envision any rate implications for First-Class Mail categories in the next few years as a result of this decline?

(b) What plans has the Postal Service made to replace the revenues lost if this percentage declines further? Please provide copies of any documents addressing this issue.

#### 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  
February 1, 2000