UNITED STATES OF AMERICA Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 RECEIVED

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POSTAL RATE CONMISSION OFFICE O. THE SPORETARY

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-T33-4-6)
February 10, 2000

Pursuant to sections 26 and 27 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,

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-T33-4. Please refer to your response to OCA/USPS-T29-8 (redirected from Witness Campbell). You state, "My proposed increase in the passthrough in the current docket is consistent with a discount that is now established."

- (a) Please state all of the reasons you believe the QBRM discount is "now established."
- (b) Please provide all *actual* cost, revenue, and other data which have been collected for QBRM.

OCA/USPS-T33-5. Please refer to your response to OCA/USPS-T29-8 (redirected from Witness Campbell). You state, "In the current docket, I have proposed discounts for both QBRM letters and cards of three cents below the proposed single piece rates of 34 cents for letters and 21 cents for cards." Was the passthrough percentage a factor in your discount proposals, or was the 90-percent passthrough simply a result of your proposals? Please explain fully.

OCA/USPS-T33-6. Are you aware of any information that shows whether QBRM has "attracted more volume from First-Class Mail than anticipated?" If so, please provide all such information.

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.

Stephanic Ufactace
Stephanic Wallace

Washington, D.C. 20268-0001 February 10, 2000