

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-T33-7-8)
February 11, 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,



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Director
Office of the Consumer Advocate

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Attorney

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OCA/USPS-T33-7. Please refer to your testimony at page 15, lines 2-7.

- (a) Please confirm that Letters and Sealed Parcels subclass mail weighing one ounce or less that does not conform to the specified aspect ratio of at least 1 to 1.3 (i.e., that is, between 1 to 1 and 1 to 1.3) is nevertheless processed on the following mail processing equipment: facer-cancellers, OCRs, and BCRs. If you do not confirm, please explain.
- (b) Please confirm that nonconforming mail identified in part (a) of this interrogatory is not returned to the sender or delivered to the recipient with a marking of postage due equal to the nonstandard surcharge. If you do not confirm, please explain. Include in your explanation an identification of the portion of such mail that is not returned to sender or delivered to the recipient with a marking of postage due.
- (c) Please provide the total revenue produced by the nonstandard surcharge.
 - (i) What portion of the total revenue produced by the nonstandard surcharge is from letters and sealed parcels below the specified aspect ratio of 1 to 1.3?
 - (ii) What portion of the total revenue produced by the nonstandard surcharge is from letters and sealed parcels exceeding the specified aspect ratio of 1 to 2.5?
 - (iii) What portion of the total revenue produced by the nonstandard surcharge is from letters and sealed parcels that exceed the standard letter-size dimensions?

OCA/USPS-T33-8. Please refer to your testimony at page 19, lines 17-18.

- (a) Please confirm that the term "workshared First-Class Mail" does not include "workshared First-Class Mail" qualifying for Basic Presort. If you do not confirm, please explain.
- (b) Please provide the source for the 69 percent figure.
- (c) Please provide the percentage of, and source for, workshared First-Class Mail qualifying for the Automation Basic Presort Rate Category comparable to the percent identified in part (b) above.
- (d) Please provide the percentage of, and source for, workshared First-Class Mail qualifying for Automation Carrier Route Presort comparable to the percent identified in part (b) above.
- (e) Please confirm that workshared First-Class Mail qualifying for the Automation Basic Presort Rate Category is "residual" mail; that is, mail qualifying for automation discounts that cannot be sorted to the 3-digit and 5-digit level. If you do not confirm, please explain.

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 11, 2000