

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 WILLIAM P. TAYMAN (OCA/USPS-T9-12-17)  
February 11, 2000

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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

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OCA/USPS-T9-12. The following refers to USPS-LR-I-127, filename WHRCNV00.xls, worksheet WKHRCONV. Please update the worksheet to reflect the "PFY 1999 ACTUAL WORKHOUR CONVERSION FACTORS."

OCA/USPS-T9-13. The following refers to USPS-LR-I-127, filename SPTDC\_00.xls. For each worksheet in the file, please update all manual inputs to reflect FY99 actuals and the FY00 Operating Budgeted amounts for the most recently completed accounting period.

OCA/USPS-T9-14. The following refers to USPS-LR-I-126, page 19, "Rehabilitation Program Hours." Please explain the basis for the program manager's additional 1,795,000 hour estimate for clerks in FY00. Please provide the actual increase in hours by labor category for FY98, FY99 and the FY00 Operating Budgeted hours for the most recent accounting period.

OCA/USPS-T9-15. The following refers to USPS-LR-I-126, page 19 to 20, "Customer Address Awareness." The library reference indicates that city carrier hours increased 41,000 hours as a result of the customer address awareness.

(a) Please explain why city carriers hours increased as a result of a campaign to improve customer use of apartment/suite numbers designed to increase the speed of mail delivery.

(b) Are city carriers being used to educate the public on address hygiene?

(1) If your response to part "b" of this interrogatory is affirmative, please provide all data indicating the success/failure rate city carriers had in going "door to door."

- (2) Please provide all documents, scripts or other educational tools used by the city carriers during the "customer awareness campaign."
- (3) Did the Postal Service perform a cost/benefit analysis evaluating the costs of using various forms of advertising versus using city carriers? If so, please provide a copy of the analysis and cite all source documents used. If not, please explain why one was not performed.
- (a) If your response to part "b" of this interrogatory is negative, please explain what caused the estimated increase in city carrier hours for FY99.
- (b) What is the cost impact of including the estimated 41,000 hours of increased city carrier costs on the individual mail class and subclass cost categories for FY00 and FY01 as opposed to increasing USPS advertising costs?

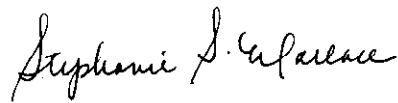
OCA/USPS-T8-16. Please refer to USPS-LR-I-126, page 26, "Stamp Manufacturing." The costs for various supplies and services were estimated to increase by \$40 million for FY01. Please provide a detailed breakout of the \$40 million increase. Identify in your breakout, the cost of producing the "designed non-denominated" and "makeup stamp," as well as an estimate of the volume of First-Class makeup stamps to be printed. If a stamp usage factor other than 100 percent was assumed, please provide the estimated usage factor. For purposes of answering this interrogatory, assume that the Postal Service is granted the one-cent increase in the First-Class letter rate.

OCA/USPS-T8-17. For the First-Class letter "makeup stamp" that was most recently printed, please provide the following: (1) the production costs, (2) the

volume of makeup stamps printed, (3) the quantity sold in the calendar year immediately following its release, and (4) the actual quantity used.

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 cursive script that reads "Stephanie S. Wallace".

Stephanie S. Wallace

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