

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-T33-9-12)  
March 16, 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,



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OCA/USPS-T33-9. Please refer to your testimony at page 27, lines 5-8.

- (a) Please identify and describe who you are referring to where it states "our customers mailing at the nonautomation presort rate."
- (b) What percent of mail qualifying for the nonautomation presort rate in FY1998 was
  - (i) prepared and presorted by firms "in-house" for entry directly with the Postal Service?
  - (ii) simply presorted by firms commonly referred to as "presort bureaus?"
  - (iii) prepared and presorted by firms commonly referred to as "service bureaus?"
  - (iv) other firms providing printing or mail services?
- (c) Please describe how "presort bureaus" are typically compensated for presorting First-Class
  - (i) basic presort mail,
  - (ii) basic automation mail,
  - (iii) 3-digit automation mail, and
  - (iv) 5-digit automation mail.
- (d) Please describe in detail your understanding of the relationship between "presort bureaus" and their customers. Is it your understanding that a mailer requiring presort services typically enters into a contract or other arrangement that specifies a minimum volume of mail to be provided to the "presort bureau" on a weekly, monthly, or annual basis? Please explain.

OCA/USPS-T33-10. Please refer to your testimony at pages 33 and 34, lines 21-22, and lines 1-2, respectively.

- (a) Please confirm that the term "Mailers" includes firms commonly referred to as "presort bureaus." If you do not confirm, please explain.
- (b) Please provide the FY1998 First-Class letter volume, or an estimate thereof, for Basic Presort, Basic Automation, 3-Digit Automation, 5-Digit Automation, and Carrier Route entered with the Postal Service by "presort bureaus."
- (c) Please provide the FY1998 First-Class flats volume, or an estimate thereof, for Regular Presort, Basic Automation, and 3/5-Digit Automation entered with the Postal Service by "presort bureaus."
- (d) Please provide the FY1998 Standard (A) letter size and non-letter size volume, or an estimate thereof, for Basic Presort and 3/5-Digit Presort entered with the Postal Service by "presort bureaus."
- (e) Please provide the FY1998 Standard (A) letter-size volume, or an estimate thereof, for Basic Automation, 3-digit Automation, and 5-Digit Automation, and the flat size volume, or an estimate thereof, for Basic Automation, and 3/5-Digit Automation entered with the Postal Service by "presort bureaus."
- (f) Please provide the FY1998 Standard (A) letter-size volume, or an estimate thereof, for Basic ECR, Basic Automation ECR, High Density, and Saturation, and the non-letter size volume, or an estimate thereof, for Basic ECR, High Density, and Saturation entered with the Postal Service by "presort bureaus."
- (g) Please confirm that "presort bureaus" (as distinct from "service bureaus") rely significantly on the presortation and entry of First-Class Mail for their livelihood.

If you do not confirm, please explain and provide any data to support your answer.

OCA/USPS-T33-11. Please refer to your testimony at pages 33 and 34, lines 21-22, and lines 1-2, respectively.

- (a) Please confirm that the term "Mailers" includes firms commonly referred to as "service bureaus." If you do not confirm, please explain.
- (b) Please provide the FY1998 First-Class letter volume, or an estimate thereof, for Basic Presort, Basic Automation, 3-Digit Automation, 5-Digit Automation, and Carrier Route entered with the Postal Service by "service bureaus."
- (c) Please provide the FY1998 First-Class flats volume, or an estimate thereof, for Regular Presort, Basic Automation, and 3/5-Digit Automation entered with the Postal Service by "service bureaus."
- (d) Please provide the FY1998 Standard (A) letter size and non-letter size volume, or an estimate thereof, for Basic Presort and 3/5-Digit Presort entered with the Postal Service by "service bureaus."
- (e) Please provide the FY1998 Standard (A) letter-size volume, or an estimate thereof, for Basic Automation, 3-digit Automation, and 5-Digit Automation, and the flat size volume, or an estimate thereof, for Basic Automation, and 3/5-Digit Automation entered with the Postal Service by "service bureaus."
- (f) Please provide the FY1998 Standard (A) letter-size volume, or an estimate thereof, for Basic ECR, Basic Automation ECR, High Density, and Saturation, and the non-letter size volume, or an estimate thereof, for Basic ECR, High Density, and Saturation entered with the Postal Service by "service bureaus."

- (g) Please confirm that “service bureaus” (as distinct from “presort bureaus”) rely significantly on services other than presortation services and entry of First-Class Mail for their livelihood. If you do not confirm, please explain and provide any data to support your answer.

OCA/USPS-T33-12. Please refer to your testimony at page 27, lines 3-5.

- (a) Please confirm that the proposed rate of 32.0 cents for Basic Presort (assuming recommendation of the proposed 34.0 cent rate for single-piece First-Class Mail) will likely result in a reduction of Basic Presort mail volume. If you do not confirm, please explain.

- (b) Please confirm that the Basic Presort mail volume fluctuates by the

- (i) day of the week,
- (ii) week of the month, and
- (iii) month of the year.

If you do not confirm, please explain.

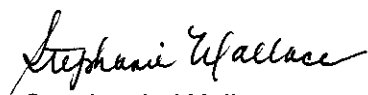
- (c) Please confirm that the Basic Presort mail volume provided by “in-house” firms, “presort bureaus” and “service bureaus” fluctuates by the

- (i) day of the week,
- (ii) week of the month, and
- (iii) month of the year.

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  
March 16, 2000