

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
(OCA/USPS-91-92)
March 16, 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

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Docket No. R2000-1

OCA/USPS-91. Please provide a breakdown of volume for FYs 1998 and 1999 by category of mail by ODIS exit mode. Please reconcile the volumes in LR-I-95, file LR95del.xls, tab Delivery Volumes with the 1998 ODIS volumes.

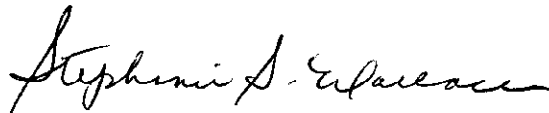
OCA/USPS-92. Please refer to witness Mayes's response to interrogatory NAA/USPS-T32-30(a). She states,

[I]n a previous docket, the desire to reduce what had been viewed in an even more distant case as excessive cost coverage may have been thwarted

- (a) Please identify all instances since (and including) Docket No. R90-1 in which a desire to mitigate a rate increase has been "thwarted." For example, in how many dockets has a desire to mitigate the rate effect of the letter-flat cost differential in Standard (A) been "thwarted"?
- (b) Please identify all instances since (and including) Docket No. R90-1 in which a desire to mitigate a rate increase has been successful. For example, in how many dockets has a desire to mitigate the rate effect of the letter-flat cost differential in Standard (A) been successful?

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 S. Wallace

Washington, D.C. 20268-0001
March 16, 2000