

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-T33-13-16)
March 21, 2000

Pursuant to sections 25 and 26 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-T33-13. Please refer to interrogatory MMA/USPS-T33-7 and your response to part (a) thereof. You state "that in developing [your] additional ounce rate proposal, [you] did not use the weight study data [LR-I-91] on this disaggregated a basis (that is, disaggregated by shape and by weight step)."

- (a) Do the disaggregated data (by shape and by weight step) suggest that there are significant cost differences by shape for the single piece category of letters and sealed parcels? Please site specific data from the weight study to support your answer.
- (b) Has the Postal Service considered or studied shape-based rate differentials for First-Class letters and sealed parcels? Please provide copies of all documents related to this question.
- (c) Did *you* consider the desirability or need for shape-based rate differentials for First-Class letters and sealed parcels? Please elaborate on your response and provide copies of all documents related to this question.
- (d) Do the weighted (by volume within shape and weight cell) costs from the weight study match the total volume variable costs of First-Class letters and sealed parcels? Please site specific data from the weight study and billing determinants to support your answer.
- (e) Please show the rate schedule that would result from applying a cost coverage of 171.2 percent to unit attributable costs of single piece First Class letters and sealed parcels disaggregated by shape and by weight step. Please confirm that such a rate schedule would generate the same revenue as your proposed schedule. If you do not confirm, please provide an arithmetic demonstration

using the same approach to calculating total revenue that you have used (i.e., assuming that billing determinants all change in the same proportion when going from before rates to after rates volumes).

- (f) Has the Postal Service observed any change in the proportions of First Class single piece letters and sealed parcels by weight step as a result of the R97-1 change in the additional ounce rate? Please provide the FY1998 and FY1999 volumes by weight step for First Class single piece letters and sealed parcels.

OCA/USPS-T33-14. Please refer to interrogatory Stamps.Com/USPS-T33-4 and your response to part (c) thereof. You state, "While I recognize that the QBRM discount is a single-piece discount, it really represents a special case because it is single piece mail that is received in bulk . . . and that meets mail preparation standards that ensure its automatibility" Please estimate the proportion of courtesy reply envelopes that

- (a) is received in bulk,
(b) meets mail preparation standards that ensure its automatibility.

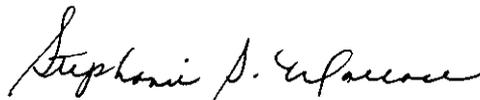
OCA/USPS-T33-15. Please refer to the response to interrogatory MMA/USPS-1.

- (a) Has the Postal Service considered or studied a separate charge for returning or forwarding First-Class letters and sealed parcels? Please provide copies of all documents related to this question.
- (b) Did *you* consider the desirability or need for a separate charge for returning or forwarding First-Class letters and sealed parcels? Please elaborate on your response and provide copies of all documents related to this question.
- (c) Please provide a complete copy of the UAA Mail Study performed in 1999.

OCA/USPS-T33-16. Please refer to your testimony in Docket No R97-1 at page 42 and footnote 16. You stated, "In FY 1996, 12.51 percent of the single-piece First-Class Mail in ODIS (excluding BRM) was identified as Stamped and Metered FIM (see Response to OCA/USPS-T3-10 in Docket No. MC97-1). Applying this percentage to TY 1998 single-piece volume of 54.5 billion yields 6.8 billion pieces." Please provide an estimate of courtesy reply mail for the test year of the current proceeding.

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 21, 2000