

BEFORE THE POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES

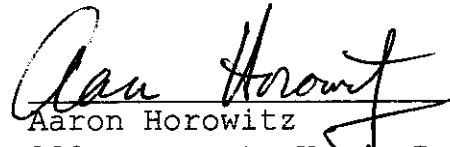
Docket No. R2000-1

FIRST SET OF INTERROGATORIES OF THE  
CONTINUITY SHIPPERS ASSOCIATION  
TO USPS WITNESS MAYO (CSA/USPS-T39-1-20)

Pursuant to section 20 of the Commission's Rules of Practice, the Continuity Shippers Association submits the attached interrogatories and document requests to USPS witness Mayo (USPS-T-39) or to such other USPS witness who can respond to them.

Dated: March 20, 2000

Respectfully Submitted,

  
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(847) 913-3360

Attorney for the Continuity  
Shippers Association

CSA/USPS-T39-1. Please state the basis for your understanding (page 17 of your testimony) that a cost coverage close to the systemwide average was the intention at the inception of the Bulk Parcel Return Service.

CSA/USPS-T39-2. Please compare the activities covered by the proposed accounting fee for BPRS, and the activities covered by the accounting fee for Business Reply Mail.

CSA/USPS-T39-3. Should the BPRS accounting fee be affected by the fact that half of the mailers perform the postage due function and the Postal Service only has to audit the work (and the costs of auditing are included in the BPRS per piece fee)? If not, why not.

CSA/USPS-T39-4. Please confirm that the Postal Service's determination of when to deliver BPRS returns and when the mailer can pick up BPRS returns signifies a lower value of service. If you do not confirm, please explain.

CSA/USPS-T39-5. Please confirm that the existence of higher priced non-Postal Service alternatives do not indicate the value of a particular Postal service, i.e. higher priced alternatives explain demand or usage of a Postal service. If you do not confirm, please explain.

CSA/USPS-T39-6. Please confirm that the machinability requirement for BPRS parcels reduces the costs of processing BPRS parcels. If you do not confirm, please explain.

CSA/USPS-T39-7. Please confirm that since half of the BPRS mailers pick up their BPRS returns, BPRS has a lower value of service. If you do not confirm, please explain.

CSA/USPS-T39-8. Please confirm that BPRS does not have a service standard. If you do not confirm, please explain.

CSA/USPS-T39-9. Please confirm that the lack of a service standard reduces the value of service. If you do not confirm, please explain.

CSA/USPS-T39-10. Please confirm that BPRS parcels receive low priority in terms of transportation and processing; only ground transportation is used; and the Postal Service determines the frequency of the mailer's pickup of BPRS parcels or its delivery of BPRS parcels. If you do not confirm, please explain.

CSA/USPS-T39-11. Please confirm that the following indicate a lower value of service: BPRS parcels receive low priority in terms of transportation and processing; only ground transportation is used; and the Postal Service determines the frequency of the mailer's pickup of BPRS parcels or its delivery of BPRS parcels. If you do not confirm, please explain.

CSA/USPS-T39-12. Please confirm that only parcels mailed out Standard A can be returned under BPRS. If you do not confirm, please explain.

CSA/USPS-T39-13. Please confirm that the Postal Service's regulations for the BPRS labels states that the "class of mail" designation on the label is "Standard Mail (A)." If you do not confirm, please explain.

CSA/USPS-T39-14. On average, how many opened BPRS parcels were sent to a Mail Recovery Center each month since BPRS was modified in MC99-4?

CSA/USPS-T39-15. On average, how many opened BPRS were sent to a Mail Recovery Center each month between the creation of BPRS and the modification to BPRS in MC99-4?

CSA/USPS-T39-16. In general, what percentage of BPRS returns contain correspondence and/or a check for payment?

CSA/USPS-T39-17. Please confirm that the nine factors of the Act could support the same cost coverage as Standard Mail A regular. If you do not confirm, please explain.

CSA/USPS-T39-18. Please confirm that the attributable cost figure, plus contingency, you are using is \$1.13 per BPRS piece?

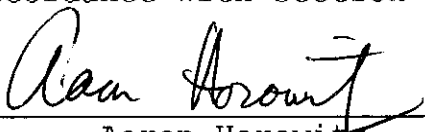
CSA/USPS-T39-19. Please confirm that if BPRS were priced at \$1.50, each BPRS piece would cover their attributable cost and contribute \$0.37 cents to institutional costs. If you do not confirm, please explain.

CSA/USPS-T39-20. What percentage of BPRS returns are from customers who have paid for the merchandise before receiving versus those customer who only have to pay for the merchandise if they decide to keep it?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing interrogatories on all participants in this proceeding who requested service of all discovery in accordance with section 12 of the Rules of Practice.

Dated: March 20, 2000

  
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Aaron Horowitz