

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
MAR 31 10 03 AM '00  
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-106-116)  
March 31, 2000

---

Pursuant to sections 25(a), 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 information available only from the Postal Service. 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

EMMETT RAND COSTICH

Attorney

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-106. Please refer to the response to OCA/USPS-69.

- (a) Please provide the same information for GFY 1998.
- (b) Please provide the information requested in OCA/USPS-69 and in part (a) of this interrogatory by shape—i.e., letters, flats, parcels.
- (c) Please confirm that the Postal Service earns additional revenue on nonstandard single-piece First Class Letters of approximately 50 percent of the revenue it would earn if all pieces paid proper postage (net overpayments of \$21.5 million versus approximately \$41.8 million if 380 million pieces paid \$0.11). If you do not confirm, please provide the correct percentages and derivations for GFYs 1998 and 1999.
- (d) Is net overpayment of all First Class postage included in the Postal Service's test year revenue calculations? If so, where?

OCA/USPS-107. Since 1997 has the Postal Service considered creating a 0.5-ounce rate element for First Class Letters (analogous to the newly proposed one-pound element in Priority Mail or the existing 0.5-ounce element in International Mail)? Has the Postal Service ever considered such a rate element since Reorganization? If so, please explain why the Service has not requested establishment of such a category and provide copies of all documents relating to this interrogatory. If not, why not?

OCA/USPS-108. What are the volume-variable costs of letter-shaped single-piece First Class Letters weighing less than 0.5 ounce? What are the volume-variable costs of letter-shaped work-shared First Class Letters weighing less than 0.5 ounce? What are the volume-variable costs of letter-shaped single-piece First Class Letters weighing

between 0.5 ounce and 1.0 ounce? What are the volume-variable costs of letter-shaped work-shared First Class Letters weighing between 0.5 ounce and 1.0 ounce?

OCA/USPS-109. Since 1997 has the Postal Service considered specific means for making letter-shaped First Class Letters more competitive with electronic bill presentment and payment? If so, please describe what means were considered and provide copies of all documents relating to this interrogatory. If not, why not?

OCA/USPS-110. Please refer to Table 4-60 (page IV-142) of the 1998 Household Diary Study. Please provide a similar table showing absolute annual numbers of transactions on a national basis in place of percentages on a monthly basis. If you cannot provide the requested data for "Phone" or "Other," please provide the absolute annual numbers of pieces for "Mail."

OCA/USPS-111. Please refer to the response of the Postal Service to interrogatory OCA/USPS-32 in Docket No. MC95-1. Please provide analogous data for FYs 1998 and 1999 broken down by subclass and shape. In other words, please provide DRPW single-piece First Class volumes by Secondary Sampling Unit (SSU) by subclass by shape. Also, please provide documentation for interpreting SSU codes and linking them to Primary Sampling Units. If different terminology or procedures were used in FY98 or FY99, please provide data that most closely match the requested breakdown plus any necessary documentation.

OCA/USPS-112. With respect to letter-sorting automation, is there an envelope size, color, and weight (or range of sizes, colors, and weights) that (*ceteris paribus*)

maximize the productivity of the equipment? If so, what are the optimal size(s), color(s), and weight(s) for each type of equipment? Are there other mailpiece attributes that significantly affect the productivity of letter-sorting automation? If so, what are those attributes and what values (or ranges of values) of those attributes maximize the productivity of each type of equipment?

OCA/USPS-113. Please refer to the attachment to the response to interrogatory OCA/USPS-42. Please confirm that the line labeled "Permit FIM" contains all Business Reply Mail volume. If you do not confirm, please provide a version of the attachment with BRM volumes broken out. Please identify where in the attachment the BRM volumes reported in response to OCA/USPS-43 appear.

OCA/USPS-114. Does the Postal Service have data on the proportion of CREs that are automation compatible and bear the proper FIM? If so, please provide any such data for FYs 1998 and 1999. Can the data provided in response to interrogatory OCA/USPS-45 be used to develop this proportion? If not, why not?


OCA/USPS-115. Please refer to Tables 4-11, 4-14, and 4-48 of the 1998 Household Diary Study. Please provide similar tables containing annual national volumes rather than pieces per household per month.

OCA/USPS-116. Witness Campbell has stated that the Postal Service does not collect caller service mail volumes. Response to interrogatory OCA/USPS-T29-10(d), filed March 27, 2000. Is witness Campbell correct, or can a reasonable approximation of caller service volumes be derived from the material requested in interrogatory

OCA/USPS-111? If so, please provide the reasonable approximation. If not, 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 S. Wallace

Washington, D.C. 20268-0001  
March 31, 2000