

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
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-121)
April 5, 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 an interrogatory and request 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

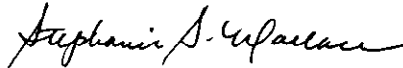
1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-121. Please refer to USPS-LR-I-191.

- (a) What is the source of the volumes in Figure 1 on page 7? Please show the derivation of each volume in Figure 1.
- (b) Please update the volumes in Figure 1 on page 7 for 1998 and 1999.
- (c) What methodology was used to calculate the \$0.29 per piece contribution mentioned on page 4 and in footnote 4 on page 8? Please show the derivation of this figure.
- (d) What is the relationship between the \$0.29 contribution figure and the \$0.18 (\$16,768,614/95,550,984) derived from USPS-T-32, Workpaper I, page 2, Docket No. R97-1, or the \$0.18 (17,774,380/99,857,394) derived from Attachment USPS-33B? Please explain fully.
- (e) Please provide a copy of the "Christensen Associates' Segmentation Analysis" referred to in footnote 4 on page 8.
- (f) This document is denoted "Draft." Is there a final report or more recent draft? If so, please provide the most recent version.

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
April 5, 2000