

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
FOLLOW-UP INTERROGATORIES TO
UNITED STATES POSTAL SERVICE
WITNESS MILLER (OCA/USPS-T-24-7-8)
April 11, 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 follow-up interrogatories and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 to the United States Postal Service, dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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Director
Office of the Consumer Advocate

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OCA/USPS-T24-7. Please refer to your answer to DFC/USPS-T24-1. There you state, "I have not personally studied the costs related to stamped cards and postcards."

- a. Please confirm that "stamped cards" were formerly referred to as "postal cards." If you cannot confirm, please explain.
- b. Has anyone else at the Postal Service studied the costs related to stamped cards and postcards? Please explain.
- c. Have witnesses in past dockets testified about the costs related to stamped cards and postcards? Please explain.
- d. Please confirm that in past dockets the IOCS did provide cost data separately for "postal cards" and postcards. If you cannot confirm, please explain.
- e. Please confirm that in past dockets the Cost Segments and Components Report and the CRA did provide cost data separately for "postal cards" and postcards.
- f. Please confirm that the Postal Service stopped tracking/reporting these costs after Docket No. MC96-3. If you cannot confirm, please explain.

OCA/USPS-T24-8. Please refer to your answers to DFC/USPS-T24-2 and 3.

- a. Please confirm that prior to Docket No. MC96-3, the unit costs reported for "postal cards" were consistently lower than those reported for postcards. If you cannot confirm, please explain.
- b. Please confirm that prior to Docket No. MC96-3, the unit revenues for postal cards exceeded costs by approximately 200 percent. If you cannot confirm, please explain.
- c. Please refer to the Commission's decision in Docket No. R97-1 at page 594 para. 6004. The Commission states that it "agrees with witness Carlson that the

evidence suggests that mail processing costs are lower for stamped cards than private cards because of physical differences between the types of cards.” Would this suggest to you that, indeed, the unit cost difference between stamped cards and postcards has been studied and reported on? Please explain.

- d. Would knowledge of the evidence presented in Dockets Nos. R97-1 and MC96-3 (specifically by OCA witness Collins and witness Carlson) cause you to modify your answers referred to above? 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.


Jennie Wallace

Washington, D.C. 20268-0001
April 11, 2000