

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

RECEIVED  
May 3 1 48 PM '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-136-138)  
May 3, 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,



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-136. Please refer to the response of the Postal Service to interrogatory OCA/USPS-55(c). Also, please refer to the website:

<http://www.directmag.com/content/newsline/2000/2000050303.htm>

The DirectNewsLine website reports that John Nolan, Deputy Postmaster General, in a May 2, 2000, speech before the Direct Marketing Association Government Affairs Conference 2000 in Washington, DC, "has organized a team that over the next few weeks will begin work planning *the 2003 and 2005 rate cases . . .*" (emphasis added).

- (a) Please provide a copy of Deputy Postmaster General Nolan's speech.
- (b) Please confirm that the DirectNewsLine report of the speech of Deputy Postmaster General Nolan with respect to planning for the "2003 and 2005 rate cases" is accurate. If you do not confirm, please explain.
- (c) Please confirm that it is the intent of Postal Service management to limit the period during which new postal rates will be in effect to approximately two years. If you do not confirm, please explain in detail the rationale for planning for the "2003 and 2005 rate cases."

OCA/USPS-137. Please refer to Docket No. R97-1, USPS-LR-H-130 at page 10, Tables 5.1, 5.2 and 5.3, revised 10/6/97. In Table 5.2, "OSS Reject Rates," please confirm that the "reject rates" for "Handwritten First-Class collection mail" result from a calculation and are actually the product of a reject rate and a downflow density.

- (a) Please provide a narrative explanation of the derivation and interpretation of these "reject rates" that is more extensive than is provided at page 2 of LR-H-130.
- (b) If you do confirm, please provide the "reject rates" and downflow densities used to calculate the figures for "Handwritten First-Class collection mail." Please show all calculations and provide citations to all figures used.
- (c) If you do not confirm, please explain in detail the derivation of these figures for "Handwritten First-Class collection mail." Please show all calculations and provide citations to all figures used.

OCA/USPS-138. Please refer to LR-I-160, section L, page 2 of 15, and LR-I-162, tab BMM LTR CRA. The OCA is attempting to derive an estimate of the unit cost of handwritten low-aspect-ratio First Class letter-shaped pieces. Please state whether it is appropriate to use the spreadsheet from LR-I-160 for this purpose, and if not, why not. The OCA's specific concern is the lack of CRA fixed adjustment factors in the LR-I-160 spreadsheet.

#### 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 D. WALLACE

Washington, D.C. 20268-0001  
May 3, 2000