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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA–T8—1–5)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United

States Postal Service directs the following interrogatories and requests for production of

documents to Office of the Consumer Advocate witness Collins: USPS/OCA–T8—1–5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–2986; Fax –6187
May 26, 2000

USPS/OCA-T8-1. Please refer to your Exhibits OCA-T-8A and 8B. Why do you use TYBR numbers to calculate cost coverages?

USPS/OCA-T8-2. Please refer to your Exhibit OCA-T-8B. Please confirm that the cost coverage calculated using money order fee revenues only (that is, excluding money order float and outstanding money orders taken into revenue) and incremental costs is 81.1 percent (182,419/224,831). If you do not confirm, please explain.

USPS/OCA-T8-3. Please refer to pages 10 to 12, in which you discuss "electronic money orders."

(a) Do you propose that the Commission make any recommendation in this proceeding for changes to the DMCS or rate/fee schedules, with respect to electronic money orders? If so, please describe the changes you are proposing.

(b) On page 10 you state that "Internet activity is a source of potential increased demand for money orders." Would new customers using money orders for Internet transactions tend to be low-income individuals, to the same extent as customers using money orders for non-Internet transactions? Please explain the basis for your response.

USPS/OCA-T8-4. On page 15 of your testimony, you recommend that "there be no increase in the $100 increment fee, and that there be a modification of the interval to $250 or $500 for insured value over $100, with a corresponding adjustment in the per increment fee."

(a)   Do you support the Postal Service's proposal for a 138.4 percent cost coverage for insurance service? If not, please present your alternative cost coverage proposal.

(b)   Do you support an increase in the Postal Service's proposed insurance fees for the up to $50, and $50-100 value levels, in order to make up for revenue losses that would result from reducing the proposed incremental fees from $1.00 to $0.95? Please explain your response.

(c)   Please explain what you mean by a "corresponding adjustment" in the per increment fees for insured value over $100. For example, would the per increment fee be five times as large for a $500 value interval as for a $100 value?
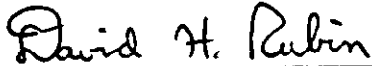
USPS/OCA-T8-5. Please refer to page 17, lines 31 to 33, in which you ask the Commission to "recommend that the no-charge status for provision of electronic delivery confirmation service to bulk Priority Mail users be extended to individuals."

(a)   Please reconcile this request with your statement on page 16, lines 16 to 17, that "[a] number of these Internet companies are offering electronic delivery confirmation service through their web sites to individual shippers at no charge."

(b)   Do you believe that individuals are not currently eligible for the electronic Delivery Confirmation service option? If so, please explain the basis for your belief.

(c)   Do you propose that the Commission make any recommendation in this proceeding for changes to the DMCS or rate/fee schedules, with respect to

Delivery Confirmation service? If so, please describe the changes you are

proposing.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the Rules of

Practice.

David H. Rubin

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