

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
OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T8-6-9)

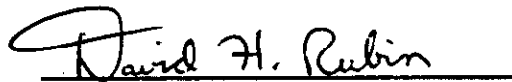
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Office of the Consumer Advocate witness Collins: USPS/OCA-T8-6 to 9.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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June 2, 2000

USPS/OCA-T8-6. Please refer to your testimony on page 5, lines 3 to 8. Please explain the relationship between the quote from witness Mayo's testimony and her views on the reliance upon money order service by consumers with modest incomes.

USPS/OCA-T8-7. Please refer to your testimony on page 6, lines 3 to 5.

- (a) Please confirm that witness Mayo's interrogatory responses (OCA/USPS-T39-21 and 22) did not demonstrate any lack of awareness of competitors charging less than half of the Postal Service's proposed fee. If you do not confirm, please explain.
- (b) Please confirm that witness Mayo reported a price of 50 cents for a \$700 money order, in response to OCA/USPS-T39-21. If you do not confirm, please explain.
- (c) Please confirm that this 50 cent price might reflect the purchase of two money orders of not more than \$500, each at a price of 25 cents. (Compare OCA/USPS-T39-22(c).) If you do not confirm, please explain.

USPS/OCA-T8-8. Please refer to the money order fee examples provided on page 7 of your testimony.

- (a) Please provide the address of the CVS drug store that charges 39 cents for a money order.
- (b) Do all CVS drug stores in the Washington, D.C. metropolitan area charge the same price for money orders? If not, please provide your knowledge of other fees charged by CVS stores.

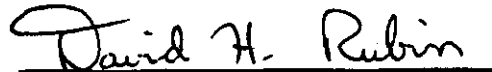
- (c) How much would a money order valued at \$700 cost at American Cash Express?
- (d) Does the Paradise Liquor Store also provide check cashing services?
- (e) Do you believe that the money orders sold at the Paradise Liquor Store and 13th Street Variety are priced to cover money order costs, or are they instead priced to attract customers into the store so that they will make other purchases?
Please explain your response.
- (f) Do any of these seven money order vendors charge a different money order fee for military personnel?
- (g) If your answer to part (f) is yes, please provide the fee(s) with the corresponding establishment(s). If your answer to part (f) is no, are you aware of any vendors other than the Postal Service that charge a different money order fee for military personnel?

USPS/OCA-T8-9. Please refer to your testimony on page 10, line 15 to page 12, line 6.

- (a) Are you aware of private companies offering money orders over the Internet?
- (b) If so, please identify these companies (including a website address if available).
Also provide the dollar amounts and corresponding prices for these money orders.

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.

A handwritten signature in cursive script that reads "David H. Rubin". The signature is written in black ink and is positioned above a horizontal line.

David H. Rubin

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