

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 WILLETTE
(USPS/OCA-T7-21-23)

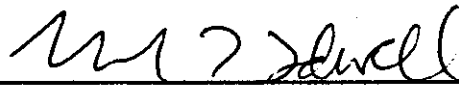
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to OCA witness Willette: USPS/OCA-T7-21-23.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

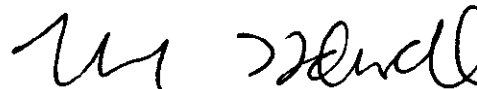
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T. Tidwell

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.



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998 Fax -5402
June 12, 2000

USPS/OCA-T7-21.

- (a) Please confirm that on June 9, 2000, you presented a paper at the 8th Conference on Postal and Delivery Economics, in Vancouver, British Columbia, and that the title of your paper was, "CEM - A Missed Opportunity?"
- (b) Please confirm that, during your presentation, you mentioned the Docket No. R97-1 market research that was conducted by witness Ellard (USPS-RT-14) and discussed by witness Miller (USPS-RT-17) in that proceeding.
- (c) Please confirm that in discussing that market research, you indicated that the Postal Service may have had a valid point when it asserted that consumers do not want two stamps. If your response is anything other than an unqualified confirmation, please explain.
- (d) Please confirm that you also stated that you thought the market research results were "inconclusive." If your response is anything other than an unqualified confirmation, please explain.
- (e) Did anyone within the OCA consider conducting any market research in conjunction with its Docket No. R2000-1 CEM proposal? If not, please explain why market research was not conducted. Please also provide all documents generated in connection with any such discussions or deliberations concerning such market research.

USPS/OCA-T7-22.

- (a) Please confirm that:
 - (1) At the conclusion of your June 9, 2000, presentation at the 8th Conference on Postal and Delivery Economics, in Vancouver, British Columbia, you were asked by an audience member whether you had given any consideration to aligning your CEM proposal with the other single-piece rate proposals that have been presented in this docket, specifically those related to PC postage.
 - (2) In response, you indicated that the OCA has had conversations with the other parties that have presented First-Class single-piece proposals in Docket No. R2000-1.
- (b) For each intervenor listed below, confirm that the OCA has had discussions with representatives from each party regarding the CEM proposal and/or the intervenor proposal indicated. If not confirmed, please explain. In addition, state the date(s) of those discussions, the

person(s) involved in those discussions, the topic(s) discussed, and the conclusion(s) you may have reached. Please provide copies of all notes, records, or other documentation that you may have maintained in connection with these discussions.

- (1) E-Stamp: PC Postage Discount Proposal
- (2) Stamps.com: PC Postage Discount Proposal
- (3) MMA: "P" Rate Proposal
- (4) Pitney Bowes: Meter Mail Discount Proposal

USPS/OCA-T7-23.

Please confirm that, at the conclusion of your June 9, 2000, presentation at the 8th Conference on Postal and Delivery Economics, the discussant, David Eagles from Canada Post, commented that more attention should be paid to what consumers really want. Do you agree with this comment? If not, please explain why not.