

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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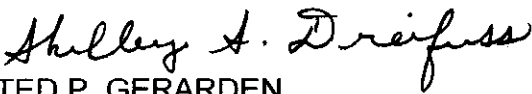
Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

ANSWERS OF THE OFFICE OF THE CONSUMER ADVOCATE
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE
WITNESS: GAIL WILLETTE (USPS/OCA-T7-1-20)
(JUNE 15, 2000)

The Office of the Consumer Advocate hereby submits the answers of Gail Willette to interrogatories of United States Postal Service, dated June 1, 2000. Each interrogatory is stated verbatim and is followed by the response. Interrogatory USPS/OCS-T7-7(a) has been redirected to witness Gerarden.

Respectfully submitted,



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ANSWERS OF OCA WITNESS GAIL WILLETTE
TO INTERROGATORIES USPS/OCA-T7-1-20

USPS/OCA-T7-1. On page 6 line 5 of your testimony you assert that, "CEM provides an opportunity to slow the diversion of mail..." Have you conducted any studies, market research, or do you have any quantitative or qualitative evidence which indicates that First-Class single-piece mailers would be less likely to use electronic alternatives if CEM were implemented? If so, please provide those data. If not, on what do you base your assertion?

RESPONSE TO USPS/OCA-T7-1:

While I have conducted no formal studies, I would point out that I have discussed this with many people over the years and found that many, if not all, of them would welcome a discount for bill payments. Whenever the price of First-Class Mail is increased, some volume is lost. If the Postal Service wishes to retain this volume, a discount would seem the best way to do so.

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USPS/OCA-T7-2. In your testimony, on page 9, at line 7, you state that "CRM envelopes will be transformed into CEM mail with only one minor alteration - the addition of a CEM indicator on the envelope informing consumers that they may use a discounted CEM stamp."

(a) Please fully describe or provide samples of your proposed "amended" CRM envelope designs referenced in your testimony (on page 13, lines 7-11) for each of the following reply envelope styles:

(i) Windowless envelopes that contain both a preprinted address and barcode on the envelope itself;

(ii) Window envelopes where the barcode is printed on the envelope but the address is printed on the insert;

(iii) Window envelopes where both the address and barcode are printed on the insert.

(b) Please fully describe or provide samples of your proposed long-term CEM envelope designs for each of the following envelope styles:

(i) Windowless envelopes that contain both a preprinted address and barcode on the envelope itself;

(ii) Window envelopes where the barcode is printed on the envelope but the address is printed on the insert;

(iii) Window envelopes where both the address and barcode are printed on the insert.

(c) Did you discuss your CEM proposals with the providers of CRM envelopes to determine whether they could or would amend CRM envelopes in the short term or change envelope designs in the long term? Please provide all correspondence, records, notes, or other documents pertaining to such communications. If no such communications took place, please explain why.

(d) Should CEM compliance be mandatory or should envelope providers have the option of modifying their envelope designs?

(e) Do you propose that the CEM envelope design be standardized, similar to BRM? If not, how will it be possible to develop a CEM design that accommodates the wide variety of reply mail envelopes discussed by witness Miller in Docket No. R97-1 (Exhibit USPS-T-17A)?

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RESPONSE TO USPS/OCA-T7-2:

(a) My testimony at page 13, lines 3-14 suggests a way for the Postal Service and businesses to make the transition to CEM by amending envelopes for use by CEM mailers. There appears to be no reason why the location of the barcode and address would affect any transition. Each of the three envelopes you describe would need an indicator on the envelope, if the Postal Service chose to inform consumers in that manner.

(b) The long-term design of CEM envelopes is entirely in the discretion of the Postal Service. I offered ideas to make the transition as easy as possible, but in the long term I envision the design details would be worked out between the Postal Service and mailers, just as the current design for CRM and other automation compatible envelopes has been.

(c) Since the Postal Service controls the design of CRM envelopes, I did not feel a need to discuss these issues extensively. Please see my response to part b, above.

(d) Whether the compliance is mandatory or not, there is very little change from a CRM to a CEM envelope. As a practical matter, businesses that provide CRM envelopes already have "mandatory" requirements in excess of those that would be needed for CEM. If the Postal Service makes the modifications voluntary, I would assume envelopes without the indicator would not qualify for reduced postage.

(e) Please note the correct cite: USPS-RT-17A. While it would be desirable to have a standardized envelope for CEM, I do not think it is necessary. A wide variety of envelopes exists in the automation mailstream. If the wide variety of envelopes described by witness Miller at USPS-RT-17A does not share identical processing and

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operational feasibility with QBRM envelopes, then witness Campbell is in error. Please see responses to OCA/USPS-T29-1-2.

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USPS/OCA-T7-3. On page 10 of your testimony, you discuss the Postal Service's testimony in Docket No. R97-1 concerning the general public preference for a "one-stamp" system. For purposes of this question, please refer to the testimony of Postal Service witness Ellard, Docket No. R97-1, Tr. 35/19076-77 and 19083-84, which addresses the issue of public preference for a "one-stamp" system vs. a "two-stamp" system.

(a) Please identify all market research or surveys performed by or for the OCA which seeks to ascertain or otherwise indicates whether the general public prefers one basic First-Class Mail first-ounce stamp or two differently denominated basic First-Class Mail first-ounce stamps? Provide all information gathered as a result of such research or surveys, as well as any analysis of such information.

(b) Please identify all market research performed by or for the OCA concerning CEM or any other "two-stamp" basic First-Class Mail rate structure. Please provide a copy of all records pertaining to such research, whether quantitative or qualitative, formal or informal, consumer-oriented or business-oriented.

RESPONSE TO USPS/OCA-T7-3:

(a) and (b). The OCA has conducted no research of the type you describe except to speak informally to members of the public concerning CEM when the opportunity arises. I would note that the Commission found witness Ellard's research unpersuasive. See PRC Op. R97-1 at 322-324.

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USPS/OCA-T7-4. On page 11 line 14 of your testimony, you state that "CEM has been and remains a very simple concept." In Docket No. R97-1, Postal Service witness Miller disagreed with this claim (USPS-RT-17, pages 4-11).

- (a) Is it more complicated or less complicated to use one first-ounce single-piece letter stamp or two first-ounce single-piece letter stamps?
- (b) Is it more convenient or less convenient to use one first-ounce single-piece letter stamp or two first-ounce single-piece letters stamps?
- (c) Is it possible that consumers and/or business agents could become confused when having to determine which stamp to use (CEM vs. residual first-ounce single-piece)?
- (d) Is it possible that consumers and/or business agents could have to make additional trips to purchase stamps were CEM to be implemented?
- (e) Is it possible that consumers and/or business agents could have to change their preferred method for purchasing stamps if vending machines and/or consignment outlets could not stock both CEM and the residual first-ounce single-piece stamps?
- (f) Assume that a CEM rate of 30 cents is currently in effect and that there are two basic First-Class Mail stamp rates: 33 cents (for non-CEM) and 30 cents (for CEM). Also assume that the Commission recommends and the Governors approve a 1-cent increase in the CEM rate and a 2-cent increase in the (non-CEM) basic First-Class Mail rate. Please describe how the mailing public would use non-denominational "make-up" stamps in conjunction with the remainder of their 30-cent and 33-cent stamps, as the higher rates were implemented.
- (g) Is it possible that some non-CEM reply envelopes that contain remittances could be delayed because consumers and/or business agents would apply the CEM stamp in error and the mail piece would be isolated as "postage due" by a postal employee?
- (h) Please confirm that CEM would require that major mailers modify their envelope designs in order for the mail piece to qualify for the discount. If not confirmed, please explain.
- (i) If all mailers do not modify their CRM envelopes to CEM envelopes, please confirm that the current CRM mail stream would be separated into two separate mail streams, CRM and CEM. If you do not confirm, please explain.
- (j) Please confirm that the current configuration of Postal Service cancellation machines could not distinguish between the CEM stamp and the residual first-ounce single-piece stamp. If you do not confirm, please explain.

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(k) Please confirm that the only way incorrect postage payment related to the new CEM stamp could be detected is if a postal employee visually identified the problem and manually dealt with it. If you do not confirm, please explain.

RESPONSE TO USPS/OCA-T7-4:

(a) This is a tradeoff for consumers to determine for themselves. It may be slightly more complicated to choose between two stamps instead of just one. However, no one is compelled to use two stamps and some consumers would accept the additional complication in order to save money.

(b) See my response to part (a) of this interrogatory. If this is a great inconvenience, I would expect consumers simply to use the full-price stamp. Also please see Docket No. R97-1, Tr. 21/10740-41.

(c) Many things are possible. I think it would be much more likely that businesses would become confused with their array of offerings than would consumers faced with two stamps.

(d) Please see my response to parts (a) and (b) of this interrogatory. As the public understands the concept after the education efforts of the Postal Service, it would seem unlikely. In any event, consumers should have the opportunity to make this decision for themselves.

(e) Please see my response to parts (a) and (b) of this interrogatory. I see no reason why vending machines and consignment outlets should not sell both types of stamps. If this is perceived as a problem, a booklet containing both types of stamps could be offered.

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(f) CEM has been proposed as a discount from the First Class rate. While I cannot speculate on what the Commission or the Governors might do in the future, I would note that a similar situation could arise with any of the First-Class Mail discounts.

(g) It is possible.

(h) Yes. However, as with other business mail, the Postal Service would control the modifications. Please see my response to USPS/OCA-T7-2 (d) and (e), above.

(i) Not confirmed. For processing purposes, CRM and CEM should be indistinguishable.

(j) Confirmed.

(k) While I cannot confirm this statement, it has been my understanding that visual identification of the problem is the method by which any incorrect postage is detected. Please see also Docket No. R97-1, Tr.19C/9046-47 where the Postal Service states that facer/canceller machines are programmed to kick out mail with no postage and mail with only nonphosphorous stamps. The response goes on to state that any mailpiece which has at least ten cents in postage, but less than sufficient postage, will only be identified as short paid by an employee.

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USPS/OCA-T7-5. On page 12, lines 17-18 of your testimony you state that, "printing costs for new CEM envelopes should be the same or substantially the same as currently exist." Did you conduct any research and/or collect any data to substantiate this claim? If so, please provide all research and/or data. If not, on what do you base your claim?

RESPONSE TO USPS/OCA-T7-5:

Please see Docket No. R97-1, Tr. 21/10691 and 10750. The OCA has conducted no subsequent research.

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USPS/OCA-T7-6. On page 14 of your testimony you discuss the revenue loss associated with the CEM discount. Please state where you think the funds that offset this revenue loss should come from in order for the Postal Service to meet its revenue requirement.

RESPONSE TO USPS/OCA-T7-6:

The OCA has proposed that the contingency amount be reduced. Please see OCA-T-2 and OCA-T-3. Keep in mind it is very unlikely that all of the 10 billion pieces I identified as potential CEM pieces would convert in the beginning. Rather, like other new services, I would expect the volume to increase gradually.

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USPS/OCA-T7-7. On page 18 lines 13-14 of your testimony you state that CEM will "more closely align rates with costs for household mailers."

(a) Is more closely aligning rates with costs for letters and cards generated [sic] household mailers a goal of the OCA?

(b) Please confirm that implementation of a separate, higher rate for hand-addressed letter mail pieces would more closely align rates with costs for household mailers? If not confirmed, please explain.

RESPONSE TO USPS/OCA-T7-7:

(a) Redirected to witness Gerarden.

(b) This is a complex issue. The obvious answer is yes; however, "closely aligning rates with costs" is not the only goal of the Postal Reorganization Act. Please see also the response of witness Campbell to KE/USPS-T29-16(b) where he points out that the cost of processing handwritten mail has dropped significantly.

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USPS/OCA-T7-8. On page 20 lines 1-2 of your testimony you state, "I would observe that the Commission dismissed such operational objections to CEM in Docket No. MC95-1, as well it should here." Please specifically list each "operational objection" to which you are referring and explicitly state why it should be ignored.

RESPONSE TO USPS/OCA-T7-8:

Please see the discussion of CEM in PRC Op. MC95-1 beginning at V-24 and continuing through V-37.

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USPS/OCA-T7-9. On page 21 lines 6-7 you claim that "simplicity of structure will be maintained with the establishment of CEM..." Please explain how this criterion is satisfied, given that CEM would result in two first-ounce single-piece letter stamps rather than one first-ounce single-piece letter stamp.

RESPONSE TO USPS/OCA-T7-9:

The CEM rate would be the same as the QBRM rate. Proposing a separate rate for CEM would have caused the rate structure to be slightly more complicated. The simplest rate structure would consist of only one rate. This is true for all mail.

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USPS/OCA-T7-10. On page 22 lines 1-2 you state that CEM "has evolved over a period of years." Please explain how your Docket No. R2000-1 CEM proposal has "evolved" in relation to your Docket No. R97-1 proposal.

RESPONSE TO USPS/OCA-T7-10:

There are fewer differences between my R97-1 proposal and my current proposal than there are between my current proposal and earlier proposals. If you review the Appendix to my testimony and the Commission Opinions, the evolution of this proposal becomes more clear. The focus of CEM has shifted more to CRM as time has passed and we have been able to assess information on the volume of FIM-tagged mail. Operational objections have been addressed and the Commission is satisfied that the revenue impact of CEM is not unduly large. Please see PRC Op. R97-1 at 322-327.

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USPS/OCA-T7-11. On page 15 line 1 you state, "Underpayment of postage does not appear to be a problem for the Postal Service..." Please refer to the response to OCA/USPS-106, Attachment 4 of 15. In GFY 1999, 239 million single-piece letters were underpaid by 1-cent. It is likely that these underpayments were due to the application of a 32-cent stamp after the first-ounce single-piece letter rate was increased to 33 cents.

(a) Do you consider the underpayment of postage for 239 million single-piece letters to be a problem? If your response is no, please explain.

(b) Assume that consumers and/or businesses did not intentionally underpay the postage and/or they were confused about the actual rate at the time the letters were mailed. Is it possible that the implementation of CEM could lead to the same results? If your response is no, please explain your answer. If your response is yes, wouldn't this problem be permanent in nature (compared to the temporary situation that occurs during new rates implementation) due to the fact that the public would be faced with two first-ounce single-piece letter rates?

RESPONSE TO USPS/OCA-T7-11:

(a) The underpayment of postage by one cent on 239 million single-piece letters amounts to \$2,390,000. Clearly this does not represent a significant impact on Postal Service finances.

(b) It is clear from the response to OCA/USPS-106 that postage is more often overpaid than underpaid. Some confusion could be expected in the beginning of implementing CEM. This is true with any new service and for new rates as your question points out.

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USPS/OCA-T7-12. On page 15 line 2 you state, "consumers appear to err on the conservative side when applying postage." On lines 4-5 of that same page you further state, "It also seems likely that some consumers will not want to keep two denominations of stamps handy."

(a) Based on this latter comment, isn't it possible that some consumers do not "err" at all but intentionally overpay postage because they prefer using only one stamp (e.g., if a mail piece weighed two ounces they would apply two 33-cent stamps, rather than one 33-cent stamp and one 22-cent stamp)?

(b) Doesn't this repeated overpayment of postage seem to suggest that convenience is more important to many single-piece letter mailers than price? If your response is no, please explain.

(c) If convenience were demonstrated to be more important to consumers than price, what benefit would a new CEM rate offer to the general public?

RESPONSE TO USPS/OCA-T7-12:

(a) and (b) That certainly may be true for some consumers, but I would hesitate to generalize to all consumers. In any event, consumers are in a better position than the Postal Service to make this decision.

(c) I do not believe that it can be demonstrated that all or even many consumers make the choice your question implies at all price levels. If it can be demonstrated that consumers simply do not care how much a First-Class stamp costs, then the volume of CEM would probably be far below the 10 billion pieces I estimated as potential. Consequently the revenue impact would be much smaller.

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USPS/OCA-T7-13. Have you conducted any "benchmarking" studies to determine if postal competitors and/or foreign postal administrations have a mail classification similar to CEM? If so, please provide all supporting documentation from that study.

RESPONSE TO USPS/OCA-T7-13:

I have conducted no "benchmarking" studies as you define them.

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USPS/OCA-T7-14. Figure 1 (OCA-T-7 at page 6) indicates that household's share of First-Class Mail declined from 21.3 percent to 16.3 percent between 1987 and 1997.

- (a) Please confirm that the response to OCA/USPS-T33-2 presented the volumes associated with these percentages – 16.8 billion pieces in 1987 and 16.2 billion pieces in 1997, or a decline of 0.6 billion pieces. If you are unable to confirm, please explain.
- (b) How many of these 0.6 billion pieces were bill payments? Please explain.
- (c) What evidence do you have that this decline represents bill payments as opposed to a decline in personal correspondence and the use of greeting cards?
- (d) If the decline in household use of First-Class Mail is due primarily to declines in personal correspondence and greeting cards, how will that affect the ability of a CEM rate to forestall diversion?

RESPONSE TO USPS/OCA-T7-14:

- (a) I can confirm that these figures are presented in OCA/USPS-T33-2. My focus was on the 14.9 billion piece volume for 1998. Please see the response to OCA/USPS-T33-1(a), where witness Fronk states (concerning the 14.9 billion pieces) "I agree that this calculation results in a reasonable approximation of the volume of First-Class Mail generated by households in 1998."
- (b) and (c) There does not appear to have been a decline in bill payments during the 1987 to 1997 period. However, the decline in bill payments between 1997 and 1998 appears to have been 400 million pieces.
- (d) If no decline occurs in CRM, I would expect CEM to have a smaller impact. Whether CEM can and will forestall diversion is an empirical question.

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USPS/OCA-T7-15. Please refer to page 7 of your testimony, where it states that "CEM is less complicated to administer than a program in which creditors and other business correspondents provide postage paid envelopes for customers." Does this statement refer to Business Reply Mail as well as Prepaid Reply Mail? Please explain.

RESPONSE TO USPS/OCA-T7-15:

Yes. The accounting function associated with BRM would seem to make it more complicated to administer.

ANSWERS OF OCA WITNESS GAIL WILLETTE
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USPS/OCA-T7-16. Please identify all market research conducted by or for the OCA concerning the ability or desire of retail businesses which sell postage stamps to the public (through consignment arrangements with the Postal Service) to offer two differently denominated basic First-Class Mail stamps to their customers seeking to purchase postage stamps? Please provide a copy of all records relating to such research.

RESPONSE TO USPS/OCA-T7-16:

The OCA has conducted no formal research on this subject. Also please see my response to USPS/OCA-T7-4(e) above.

ANSWERS OF OCA WITNESS GAIL WILLETTE
TO INTERROGATORIES USPS/OCA-T7-1-20

USPS/OCA-T7-17. Please identify all market research conducted by or for the OCA concerning the nature of any operational or logistical challenges which might be encountered by utility companies or other entities that stock large volumes of reply envelopes (to send to customers) in switching from their current envelope stock to CEM envelopes? Please provide a copy of all records relating to such research.

RESPONSE TO USPS/OCA-T7-17:

The OCA has conducted no formal research on this subject. The Commission has considered and rejected such "challenges" as a reason for rejecting CEM. PRC Op. MC95-1 at V-34-35.

ANSWERS OF OCA WITNESS GAIL WILLETTE
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USPS/OCA-T7-18. On page 20 of your testimony you state, "Automatic debit and computer payment systems are still in their infancy, and many question their reliability; we are still largely a society which needs or desires a paper record of transactions, which payment by mail facilitates." Please confirm that your testimony in Docket No. R97-1 (OCA-T-400, page 24 at lines 7-9), filed in December 1997, approximately 2½ years ago, includes the exact same sentence.

RESPONSE TO USPS/OCA-T7-18:

Confirmed. The statement is still true. As these systems mature and gain acceptance, more transactions mail will disappear from the First-Class mailstream. Please see my testimony at page 1 and USPS-LR-I-179.

ANSWERS OF OCA WITNESS GAIL WILLETTE
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USPS/OCA-T7-19. In your Docket No. R2000-1 testimony, you discuss other issues impacting a consumer's choice of bill payment method: security (page 7); convenience (page 16); and trust (page 18).

- (a) What specific role do you think price plays in this choice of method? Please explain the basis for your opinion.
- (b) What evidence do you have that a discount of 3 cents will have any material impact on a consumer's choice of bill payment method?

RESPONSE TO USPS/OCA-T7-19:

- (a) The point that I was making in the discussion you cite is that some consumers might stay with the Postal Service as their method of bill payment because of these factors, particularly if a discount is offered. I have not quantified the exact role of price and these other factors in the determination of how consumers will pay bills during the test year and later.
- (b) While I do not have empirical evidence that a three cent discount will alter a consumer's choice of payment, there is reason to believe that consumers will react positively to a reduction in price, just as they do in grocery stores and on the internet.

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USPS/OCA-T7-20. On pages 14-15 of your testimony, you indicate that your CEM proposal could involve a revenue reduction of \$300 million.

- (a) How would you propose that the Postal Service recover this lost revenue?
- (b) If the Postal Service needed to recover this revenue reduction, plus the additional costs associated with CEM implementation, from other rates paid by postal customers, how would this affect your assessment of the consumer benefits of CEM?

RESPONSE TO USPS/OCA-T7-20:

- (a) Please see my response to USPS/OCA-T7-6 above.
- (b) I have not analyzed alternative methods of offsetting the revenue lost as a result of the CEM discount. I would point out that the \$300 million represents 0.43 percent of the Postal Service's proposed TYAR revenue of approximately \$69 billion.

DECLARATION

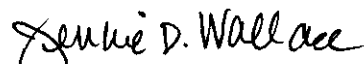
I, Gail Willette, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T7-1-20 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed June 15, 2000

Gail Willette

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, DC 20268-0001
June 15, 2000