

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  
STAMPS.COM WITNESS LAWTON  
(USPS/STAMPS.COM-T-3-4-5)

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 Stamps.com witness Lawton: USPS/STAMPS.COM-T-3-4-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Joseph K. Moore

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June 16, 2000

**USPS/STAMPS.COM-T3-4.** Please provide a copy of the questionnaire used in conducting the survey that underlies your testimony, and please provide a copy of any workpapers associated with developing the results set forth in your testimony.

**USPS/STAMPS.COM-T3-5.** On page 7, lines 6-11, you state:

The design was a retrospective study, that is, customers were asked to record the ways in which they carried out postal activities prior to their use of Stamps.com. Retrospective data is always at risk for response error due to poor recall. The ideal study design for capturing change in behavior is to interview while the respondents are still engaged in the first situation, and then re-interview the identical respondents when they are in a different situation.

- (a) On page 7, you candidly admit that some respondents were confused about whether they were being asked about current addressing practices or past addressing practices. Do you think that any of the other results presented in Figures 1-4, Tables 2-4, and Tables 6-7 were affected by respondents' confusion? Please explain.
- (b) Please quantify the impact such confusion has on the statistical precision of your results as displayed in the figures and tables of your testimony.
- (c) On page 9 of your testimony, you state that Stamps.com customers have reduced their visits to the local post office by 1 million visits. Please provide the coefficient of variation (CV) associated with this estimate.
- (d) Is the estimate presented in part (c) above affected by respondents confusion you discuss on page 7 of your testimony? Please explain.
- (e) Please explain why you did not design your study in the "ideal" manner described in the testimony quote which appears in the preamble to this question.

## 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.

  
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Joseph K. Moore

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