

UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Experimental Presorted)
Priority Mail Rate Categories, 2001)

Docket No. MC2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: JONATHAN D. LEVINE (OCA/USPS-T2-1-4)
(March 23, 2001)

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Thomas M Scherer dated March 23, 2001, are hereby incorporated by reference.

Respectfully submitted,


TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T2-1. Please refer to your testimony at page 2, lines 4-6, where you indicate that your analysis does not include other functions such as transportation and delivery. Is there any reason to believe that the costs for transportation and delivery will be different for mail eligible for the proposed Priority Mail presort discount? Are there any studies on this subject? Please provide all information, including any studies.

OCA/USPS-T2-2. Please refer to your testimony at page 3, lines 15-16, which identifies the Linear Induction Parcel Sorter (LIPS) as one of four operations in MODS specific to Priority Mail distribution.

- a. Please confirm that the Linear Induction Parcel Sorter is a mail processing operation, or part thereof, in the Management Operating Data System. If you do not confirm, please explain.
- b. Please confirm that the Postal Service provided information, regressions, and analyses of LIPS as part of, or in conjunction with, the testimonies of witnesses Bradley and Bozzo in Docket Nos. R97-1 and R2000-1.
 - i. If you do not confirm, please explain the relevance of the analysis of LIPS in this proceeding, given its absence in Docket Nos. R97-1 and R2000-1; and
 - ii. If you do confirm, please provide citations to the testimony, exhibits and library references in the referenced dockets, or copies of the information used in those dockets, relating to LIPS.

OCA/USPS-T2-3. Please refer to Attachment A at page 8, line 23, where it states that there are two phases to the data collection plan.

- a. Please identify what data or other information will be gathered during Phase I.
- b. During Phase I, what procedures are in place to assure that the data collected are statistically accurate? What hypotheses will be tested? Please discuss.
- c. During Phase I, will a written document or other analysis be prepared assessing any preliminary problems with the proposed presort discounts and determining the feasibility of allowing more mailers into the experiment? If such a document or analysis is prepared, will the Postal Service share it with the Commission at the conclusion of Phase I?
- d. During Phase II, what procedures are in place to assure that any data collected are statistically accurate? What hypotheses will be tested? Please discuss.

OCA/USPS-T2-4. Please refer to Attachment A, at pages 9 and 10, regarding a proposed market research study.

- a. Please confirm that the purpose of the proposed market research study is to develop estimates of elasticities of demand for each of the proposed presort discounts. If you do not confirm, please explain.
- b. Please confirm that the proposed market research study will develop quantitative data. If you do not confirm, please explain and describe in detail the qualitative information to be developed by the proposed market research study. If you do confirm, please identify and describe in detail the types of quantitative data to be collected.
- c. Please describe the hypotheses, if any, to be tested by the proposed market research study. Will statistically valid conclusions be drawn?

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.


Stephanie Wallace

Washington, D.C. 20268-0001
March 23, 2001