

UNITED STATES OF AMERICA  
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, 2001 )

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: SUSAN W. MAYO (OCA/USPS-T35-8-11)  
October 19, 2001

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Pursuant to Rules 25 through 28 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-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T35-8. The following refers to your response to OCA/USPS-T35-5.

Your response states,

[C]ircumstances within the control of the Postal Service, such as scheduling of transportation to and from the airport, as well as scheduling of delivery personnel to perform on-time delivery, would not be considered to be beyond the control of the Postal Service.

However, one could easily infer that scheduling of transportation to and from the airport and the scheduling of delivery personnel could be considered an example of a "breakdown in the transportation network." Please explain how the USPS can assure the public that a "postmaster or his/her designee" will not deny a claim based upon a generalized interpretation of your proposed DMCS language "breakdown in the transportation network"?

OCA/USPS-T35-9. Your response to OCA/USPS-T35-7 indicates that the Postal Service will update the terms and conditions of the Express Mail refunds appearing on the reverse side of each postage label. Please provide the cost of updating the information on the back of the Express Mail postage label. Provide an estimate of the number of Express Mail postage labels printed in FY 2000, FY 2001 and FY 2002. Provide the full calculation for both the cost data and the estimate of the number of labels. Please provide specific cites to all source documents and provide copies if one has not been previously filed in this docket.

OCA/USPS-T35-10. For Express Mail, please provide available data from the most recent year for which data are available that show, by ounce, the volume of Express

Mail for each type of mailing envelope or container supplied by the Postal Service. In preparing your answer, please provide the information in a format similar to that provided by USPS witness Scherer in his response to DFC/USPS-T30-1.

OCA/USPS-T35-11. In reducing the level of insurance automatically included in Express Mail from \$500 to \$100, please: (a) identify and explain the indemnity costs deducted from Express Mail, and (b) explain the consideration you gave to the Express Mail rate proposals with regard to the decreased value of service due to a reduction in the level of insurance included at no extra cost. Please provide specific cites to all source documents and provide copies if one has not been previously filed in this docket.

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 Rule 12 of the rules of practice.

  
h'Enri Whitseyjohnson

Washington, D.C. 20268-0001  
October 19, 2001