

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, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DAVID R. FRONK
(OCA/USPS-T32-53-56)
August 28, 1997

Pursuant to sections 25 and 26 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 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

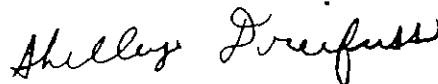
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY DREIFUSS

Attorney

OCA/USPS-T32-53. Please refer to the response of Postal Service witness Plunkett to interrogatory OCA/USPS-T3-1 in Docket No. MC97-5. The interrogatory in general posed questions about a survey's finding that customers of a pack-and-send service systematically paid postage that was too high. Witness Plunkett, in response to OCA/USPS-T3-1(f), states: "The Postal Service does not plan to require that clerks communicate this [risk of overpayment] to customers." In response to OCA/USPS-T3-1(g), witness Plunkett asserts that administering a repayment system "would be very difficult to administer" In short, it appears that the Postal Service will not refund moneys to customers who overpay postage during a pack-and-send transaction.

- a. How is this position of the Postal Service witness in Docket No. MC97-5 consistent with the Postal Service's stated concern about consumers who *knowingly or out of confusion underpay First-Class postage, i.e., the so-called "two-stamp" problem*?
- b. Is it the Postal Service's position that it cares when customers pay *too little* postage but does not care if they pay *too much*?
- c. Can the Postal Service explain its concerns over First-Class Mail customers who *knowingly* pay too little First-Class postage when the import of witness Plunkett's testimony is that the Postal Service will *knowingly* keep postage overpayments made during a pack-and-send transaction?

OCA/USPS-T32-54. The August 14, 1997 issue of the Advertising Mail Marketing Association ("AMMA") Bulletin disclosed that AMMA had sent a letter to U.S. Postal Service chief marketing officer Allen Kane, questioning the Postal Service on its

progress in the development and deployment of the Automated Barcode Evaluator (ABE). AMMA reprinted its specific questions and Postal Service responses. Please supply the AMMA letter to Mr. Kane and the Postal Service letter sent in response.

OCA/USPS-T32-55. Interrogatories 55-57 assume the accuracy of the reprinted Postal Service response ("response") as published in the AMMA newsletter. To the extent any question does not reflect the contents of the Postal Service reply, please indicate. The response states that "improvements to the equipment and increased customer awareness show that only 7 percent of customer applied barcodes fall below that level [of minimum acceptance criteria]."


- a. Please provide the latest rate for barcodes falling below the minimum accepted level. If the figure is contained in a document, please supply that document.
- b. Please describe how barcode accuracy is monitored, and with what frequency the monitoring takes place.
- c. Please set forth the costs of such monitoring, and explain (with specific reference to the testimony) how these costs are allocated in this docket.

OCA/USPS-T32-56. The Postal Service response to AMMA states: "We have not gathered data and have no plans to compile data identifying customers or geographic areas producing unreadable barcodes. The evaluation process will notify customers when errors occur and encourage those mailers to correct the problem. We see no value in pointing out such incidences of specific customers or geographically."

- a. Please describe the process referred to in the quotation that "will notify customers when errors occur and encourage those mailers to correct the problem."
- b. Please supply the most recent example of such notification.
- c. Please describe what happens to mail in the mailstream once a barcoding error is detected, include additional sortations that must take place.
- d. In reference to (c) herein, how are the costs of any additional sortations or other mail processing costs allocated in the Postal Service's costing methodology?

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.


SHELLEY DREIFUSS
Attorney

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