

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

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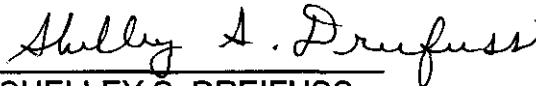
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: ABDULKADIR M. ABDIRAHMAN (OCA/USPS-T42-1-6)
November 28, 2001

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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Acting Director
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OCA/USPS-T42-1. The following interrogatory refers to USPS-LR-J-69 at page 35. Your testimony refers to USPS-LR-J-69, pages 2 to 17, in section B.

- (a) Please confirm that the Test Year unit manufacturing cost of a number 10 aggregate printed-stamped envelope is \$0.04177. (See USPS-LR-J-69 at page 33.) If you are unable to confirm, please provide the corrected amount and provide its complete derivation. Cite the sources for all calculated values.
- (b) Please confirm that the total unit Test Year selling cost for a printed envelope is estimated to be \$0.0058. (See USPS-LR-J-69 at page 35.) If you are unable to confirm, please provide the corrected amount and provide its complete derivation. Cite the sources for all calculated values.
- (c) Please confirm that the total unit cost of a printed household number 10 envelope is the sum of $\$0.04177 + \0.0058 , which is $\$0.04757$. If you are unable to confirm, please provide the step-by-step derivation and include specific cites for all calculated values.
- (d) Appendix A, page 3, of your testimony indicates that the average cost of a printed household box lot of number 10 envelopes consisting of 50 envelopes costs \$2.38. Confirm that the unit cost of a printed household number 10 envelope is $\$0.0476$ ($\$2.38 / 50$). If you are unable to confirm, please provide the corrected amount and provide its complete derivation. Cite the sources for all calculated values.
- (e) Please explain how the costs in USPS-LR-J-69 at page 36 for Test Year Distribution Costs are factored into the costs for the aggregated unit printed envelope cost of $\$0.04177$ and/or the unit selling cost of $\$0.0058$. If the Test

Year Distribution Costs are not factored into either the aggregated printed stamp envelope cost or the unit selling cost, please explain the purpose of the distribution costs and where they are incorporated into Postal Service costs.

OCA/USPS-T42-2. Please explain the differences among the printed household number 10 envelopes, as designated in your Appendix A, page 3, numbered 2127, 2135, 2146, 2147 and 2148.

OCA/USPS-T42-3. Please explain the differences between the printed household number 6¾ envelopes, as designated in your Appendix A, page 3, numbered 2623, 2643 and 2644.

OCA/USPS-T42-4. The following interrogatory refers to USPS-LR-J-69 at page 34. Footnotes 6, 12 and 13 refer to SFS data.

- (a) Please explain what the abbreviation SFS data refers to.
- (b) Please provide a copy of the SFS data used in preparing USPS-LR-J-69 if one has not been previously provided in this docket.

OCA/USPS-T42-5. The following interrogatory refers to USPS-LR-J-69 at page 34, "PFSC Customer Service Cost." Please explain what the abbreviation "PFSC" stands for.

OCA/USPS-T42-6. If one were to perform a rough estimate of the unit cost of a printed envelope (\$0.0476 – see OCA/USPS-T42-1 (b)) that incorporates manual delivery confirmation, please confirm that one could add to the unit cost of a printed envelope the cost of manual delivery confirmation for a Priority Mail piece (\$0.4064 –

from USPS-T26 at page 6) less the unit selling cost of a printed envelope (\$0.0058 – from USPS-LR-69 at page 35) yielding a unit cost of \$0.4482 (\$0.0476 + \$0.4064 - \$0.0058). If you are unable to confirm, please explain what steps would be necessary to prepare a rough estimate of the unit cost of a USPS delivery confirmation printed envelope.

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.



Stephanie Wallace

Washington, D.C. 20268-0001
November 28, 2001