

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 MAURA ROBINSON
(OCA/USPS-T29-1-2)
November 29, 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,



SHELLEY S. DREIFUSS
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OCA/USPS-T29-1. Please refer to your testimony at page 16, lines 13-14.

- a. Please confirm that the own-price elasticity of demand for single-piece letters subject to the nonstandard surcharge is relatively inelastic (i.e., elasticity between -1 and 0). If you do not confirm, please explain.
- b. Please confirm that the own-price elasticity of demand for single-piece letters subject to the proposed nonmachinable surcharge is relatively inelastic (i.e., elasticity between -1 and 0). If you do not confirm, please explain.
- c. Please provide the own-price elasticity of demand for single-piece letters subject to the nonstandard surcharge.
- d. Please provide the own-price elasticity of demand for single-piece letters subject to the proposed nonmachinable surcharge.
- e. Please confirm that the own-price elasticity of demand for workshare letters subject to the nonstandard surcharge is relatively inelastic (i.e., elasticity between -1 and 0). If you do not confirm, please explain.
- f. Please confirm that the own-price elasticity of demand for workshare letters subject to the proposed nonmachinable surcharge is relatively inelastic (i.e., elasticity between -1 and 0). If you do not confirm, please explain.
- g. Please provide the own-price elasticity of demand for workshare letters subject to the nonstandard surcharge.
- h. Please provide the own-price elasticity of demand for workshare letters subject to the proposed nonmachinable surcharge.
- i. Please confirm that the own-price elasticity of demand for single-piece First-Class letters is a reasonable approximation of the own-price elasticity of demand

for single-piece letters subject to the nonstandard surcharge. If you do not confirm, please explain.

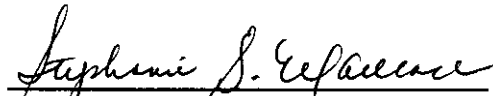
- j. Please confirm that the own-price elasticity of demand for workshare First-Class letters is a reasonable approximation of the own-price elasticity of demand for presort letters subject to the nonstandard surcharge. If you do not confirm, please explain.
- k. Please confirm that the own-price elasticity of demand for single-piece First-Class letters is a reasonable approximation of the own-price elasticity of demand for single-piece letters subject to the proposed nonmachinable surcharge. If you do not confirm, please explain.
- l. Please confirm that the own-price elasticity of demand for workshare First-Class letters is a reasonable approximation of the own-price elasticity of demand for presort letters subject to the proposed nonmachinable surcharge. If you do not confirm, please explain.

OCA/USPS-T29-2. Please refer to your response to POIR No. 4, Question 6.

- a. Please confirm that the response calculates the "current nonstandard" single-piece volume of 412,179 as follows: $(44,198 / 47,899,389) * 46,542,265$. If you do not confirm, please explain.
- b. Please confirm that the "current nonstandard" single-piece volume should be $415,041 = (44,198 / 47,899,389) * 46,865,402$. If you do not confirm, please explain.

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 29, 2001