

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

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OFFICE OF THE SECRETARY

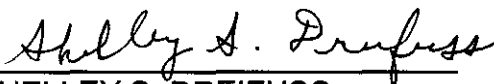
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MAURA ROBINSON
(OCA/USPS-T29-3-5)
November 30, 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-T29-3. Please refer to USPS-LR-J-130, at page 7.

- a. Please explain fully the derivation of the figures in Column (5), entitled "Implied Postage Weight per Pc." Show all calculations used to derive these figures.
- b. In Column (7), entitled "Additional Ounces," please explain fully the reasoning for subtracting 1 from the figure in Column (5) to calculate the number of additional ounces.

OCA/USPS-T29-4. Please refer to USPS-LR-J-130, at page 8.

- a. In the section entitled "(a) First Class Mail Pieces Weighing More Than One Ounce," in the columns labeled 11-12 oz and 12-13 oz under "Single Piece," please confirm that the figures in the row "FY 1999" should be 47,753,689 ($0 + 9,058,736 + 17,344,066 + 21,350,887$), and 35,749,141 ($0 + 6,311,986 + 12,677,179 + 16,759,976$), respectively. If you do not confirm, please explain.
- b. In the section entitled "(a) First Class Mail Pieces Weighing More Than One Ounce," in the columns labeled 11-12 oz and 12-13 oz under "Single Piece," please confirm that the figures in the row "FY 2000" should be 70,677,029 ($16,725,590 + 15,138,977 + 18,467,455 + 20,345,007$) and 52,936,946 ($12,648,304 + 11,258,541 + 13,167,838 + 15,862,262$), respectively. If you do not confirm, please explain.
- c. In the section entitled "(b) Total First Class Mail Pieces," in the "Single Piece" column, please confirm that the figures in the row "FY 1999" should be 53,250,548,643 ($12,254,321,505 + 13,231,821,446 + 12,497,485,998 +$

15,266,919,694), the sum of FY 1999 PQ1 through PQ4. If you do not confirm, please explain.

- d. In the section entitled "(b) Total First Class Mail Pieces," in the "Single Piece" column, please confirm that the figures in the row "FY 2000" should be 51,951,152,636 (12,024,891,049 + 13,156,882,874 + 11,958,269,313 + 14,811,109,399), the sum of FY 2000 PQ1 through PQ4. If you do not confirm, please explain.

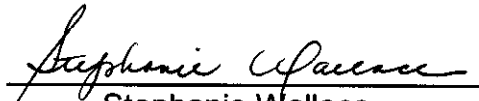
OCA/USPS-T29-5. Please refer to your testimony at pages 16 and 23, where discussion begins concerning the Nonmachinable Surcharge for single-piece and presort letters, respectively.

- a. Please confirm that the current 11-cent single-piece nonstandard surcharge does not cover the total additional cost of processing single-piece nonstandard pieces. If you do not confirm, please explain.
- b. Please confirm that the proposed 12-cent single-piece nonmachinable surcharge is not expected to cover the total additional cost of processing single-piece nonmachinable pieces. If you do not confirm, please explain.
- c. Please explain why mailers of single-piece nonmachinable pieces should not pay the total additional cost of processing single-piece nonmachinable pieces.
- d. Please confirm that the current 5 cent presort nonstandard surcharge does not cover the total additional cost of processing presort nonstandard pieces. If you do not confirm, please explain.

- e. Please confirm that the proposed 5.5 cent presort nonmachinable surcharge is not intended to cover the total additional cost of processing presort nonmachinable pieces. If you do not confirm, please explain.
- f. Please explain why mailers of presort nonmachinable pieces should not pay the total additional cost of processing presort nonmachinable pieces.

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 30, 2001