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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

COMPELLED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-66, 68, 70, and 72)

In accordance with Presiding Officer's Ruling No. R2001-1/20, the United States Postal Service hereby provides the compelled responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-66, 68, 70, and 72, filed on October 17, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

475 L'Enfant Plaza West, S.W.
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January 23, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-66. Please provide the actual video (in a format suitable for use in a standard VCR) of television advertising used to advertise Priority Mail.

- (a) Please provide specific cites to all internal Postal Service documents referring or relating to the truthfulness, accuracy, inaccuracy or deceptiveness of any advertisement or advertisements identified and include a copy of each source document referenced if one has not been previously filed in this docket.
- (b) Please provide specific cites for all tabulations, lists, summaries, analyses and compilations of consumer complaints relating to the truthfulness, accuracy, inaccuracy, or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.

Response:

See USPS-LR-J-215.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-68. Please provide a copy of the actual video (in a format suitable for use in a standard VCR) of television advertising used to advertise Express Mail.

- (a) Please provide specific cites to all internal Postal Service documents referring or relating to the truthfulness, accuracy, inaccuracy or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.
- (b) Please provide specific cites for all tabulations, lists, summaries, analyses and compilations of consumer complaints relating to the truthfulness, accuracy, inaccuracy, or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.

Response:

See response to OCA/USPS-66.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-70. Please provide copies of radio advertising (in a format suitable for a cassette tape recorder) used to advertise Priority Mail.

- (a) Please provide specific cites to all internal Postal Service documents referring or relating to the truthfulness, accuracy, inaccuracy or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.
- (b) Please provide specific cites for all tabulations, lists, summaries, analyses and compilations of consumer complaints relating to the truthfulness, accuracy, inaccuracy, or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.

Response:

See response to OCA/USPS-66.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-72. Please provide copies of radio advertising (in a format suitable for a cassette tape recorder) used to advertise Express Mail.

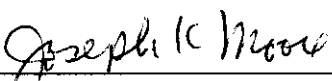
- (a) Please provide specific cites to all internal Postal Service documents referring or relating to the truthfulness, accuracy, inaccuracy or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.
- (b) Please provide specific cites for all tabulations, lists, summaries, analyses and compilations of consumer complaints relating to the truthfulness, accuracy, inaccuracy, or deceptiveness of any advertisement or advertisements identified and include a copy of each document referenced if one has not been previously filed in this docket.

Response:

See response to OCA/USPS-66.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Joseph K. Moore

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January 23, 2002