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

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Experimental Changes to Implement Capital One NSA Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS JAMES D. WILSON (OCA/USPS-T4-24-27) November 12, 2002

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-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS Director Office of the Consumer Advocate

EMMETT RAND COSTICH Attorney

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6830; Fax (202) 789-6819 OCA/USPS-T4-24. Please refer to your testimony at page 1, lines 5-7, where you discuss the Address Change Service (ACS) program. In the case of First-Class Mail, please confirm that only mailers of First-Class presort mail may become ACS participants. If you do not confirm, please explain.

OCA/USPS-T4-25. Please refer to your testimony at page 4, lines 8-10.

- (a) How many ACS participant mailers used the Change Service Requested (CSR) endorsement on First-Class in FY 2000 and 2001? State the source for this answer.
- (b) Please provide the total annual volume of First-Class Mail endorsed CSR that was disposed of by the Postal Service in FY 2000 and 2001. State the source for this answer.
 - (i) How many were pieces that would have otherwise been forwarded?
 - (ii) How many were pieces that would have otherwise been physically returned?
- (c) For parts (a) and (b) of this interrogatory, please provide ballpark estimates if precise figures are unavailable.

OCA/USPS-T4-26. Please refer to the Domestic Mail Manual (DMM), Issue 57, F030.5.3, where it states "Undeliverable-as-addressed mailpieces sent as Express Mail, Priority Mail, and First-Class Mail that cannot be forwarded or delivered as addressed are returned when possible to the sender at no additional charge." Also, please refer to DMM57 F010.5.1, and the chart showing the mailer endorsement "Change Service

Requested." There it states, "Separate notice of new address or reason for nondelivery provided; in either case, address correction fee charged; piece disposed of by USPS." Your testimony at page 4, lines 8-10, contains a statement similar to F010.5.1. Please correct or clarify the apparent inconsistency among these statements.

OCA/USPS-T4-27. Please refer to your testimony at page 5, line 12. Describe the process involved in "discarding" First-Class Mail. When First-Class Mail is discarded, does the Postal Service use different disposal techniques for customer account mail than for solicitation mail? Please explain.