

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

EXPERIMENTAL RATE AND SERVICE CHANGES  
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT  
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

UNITED STATES POSTAL SERVICE FOLLOW-UP INTERROGATORIES  
TO OFFICE OF CONSUMER ADVOCATE WITNESS CALLOW  
(USPS/OCA-T2-25-27)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the  
United States Postal Service directs the following interrogatories and requests for  
production of documents to Office of Consumer Advocate witness Callow:

USPS/OCA-T2-25-27.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3089 Fax -5402  
January 24, 2003

USPS/OCA-T2-25. Please refer to your response to COS/OCA-T2-11 where you state that small-volume mailers are likely to be discouraged by the experimental classification's requirement that mailer use NCOA or the *FASTforward* system. Assume that almost six thousand mailers each process on an annual basis 25,000 addresses or fewer through NCOA or *FASTforward* . Would that change your response? If so, how would your response change?

USPS/OCA-T2-26. Please refer to your response to COA/OCA-T2-13(c) where you discuss the term "publicly available data" as data that would be available for public inspection and review. If the Postal Service relies on its own data from the PERMIT system in setting the discount threshold, would it be required to make that data available for public inspection and review?

USPS/OCA-T2-27. Please refer to your response to USPS/OCA-T2-13 (c) where in developing a formula for the total cost savings, you state that \$.23 represents "the cost difference between a physical and an electronic return." Please confirm that the cost difference is actually \$.20 (\$.53 - \$.33 (rounded)). See USPS-LR-1/MC2002-1. If you do not confirm, please explain. If you do confirm, please describe in detail how this changes the analysis in your response to USPS/OCA-T2-13 (c).

## **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.

Nan K. McKenzie

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