

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

Customized Market Mail)
Minor Classification Changes)

Docket No. MC2003-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CHRISTOPHER C. ASHE
(OCA/USPS-T1-14-21)
March 25, 2003

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-T1-1-13 dated March 21, 2003 are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPA-T1-14. USPS-LR-2 on page 31 states the following:

No one is willing to pay for such a review; rather, they believe that the Postal Service should provide the service without a fee because it will benefit from added mail volume if such pieces were permitted.

- a. In establishing the price of mailing a CMM mail piece, did you incorporate the cost of reviewing the specification drawings or prototypes of a CMM piece?
- b. If your response to part “a” of this interrogatory is affirmative, please provide your estimate of the cost of the review. Please include copies of all documents, analyses, notes, workpapers and data sources used in developing the estimate. Provide copies of all source documents relied upon, cite all sources used and show the derivation of all calculated numbers.
- c. If your response to part “a” of this interrogatory is negative, please explain why you did not include the cost of reviewing a CMM mail piece.

OCA/USPS-T1-15. The following refers to USPS-LR-2, question number 6, part 2, page 3, of the questionnaire titled “Screener – Chicago MarketMail - Advertisers.” Please explain what the acronym “FSIs” stands for and provide a copy of an example.

OCA/USPS-T1-16. USPS-LR-2 provides copies of the two telephone surveys (Advertisers and Ad Agencies) conducted in Chicago. Were identical telephone surveys used in New York? If not, please provide a copy of each survey used in New York and fully explain where the New York and Chicago surveys differ; and, why they differ.

OCA/USPS-T1-17. Please refer to USPS-LR-2, question number 14, page 6, of the questionnaire titled “Screener – Chicago, MarketMail – Advertisers.”

- a. Please provide a table showing the total number of respondents, New York and Chicago, for each ranking level of interest. For example:

Ranks	1	2	3	4	5	6	Total
Total per rank							Total Rankings

- b. Please provide the total number of New York and Chicago advertisers that were called for this survey.
- c. For the New York and Chicago advertiser discussions, please provide the total number of advertising personnel that were available on the date of the survey.
- d. For the New York and Chicago advertiser discussions, please provide the total number of different advertising firms represented.

OCA/USPS-T1-18. Please refer to question number 9, of USPS-LR-2, page 4 of the questionnaire titled “Screener – Chicago, MarketMail – Ad Agency.”

- a. Please provide a table showing the total number of respondents, New York and Chicago, for each level of interest. For example:

Ranks	1	2	3	4	5	6	Total
Total per rank							Total Rankings

- b. Please provide the total number of New York and Chicago ad agency personnel that were called for this survey.

- c. For the New York and Chicago ad agency discussions, please provide the total number of ad agency personnel that were available on the date of the survey.
- d. For the New York and Chicago ad agency discussions, please provide the total number of different ad agencies represented.

OCA/USPS-T1-19. The following refers to USPS-LR-2, “Customized MarketMail Study Ad Agency Discussion Guide.”

- a. Was the same Ad Agency Discussion Guide used in both the New York and Chicago discussion groups? If not, please provide a copy of the second Ad Agency discussion guide.
- b. If the discussion guide used for the two Advertiser groups differed from that used for the ad agency discussions, please provide a copy of each Advertiser Discussion Group Guide used and explain why the advertiser guides differed from the ad agency guides.
- c. In the discussion guide introduction, the ground rules indicate that the discussions may have been audio taped. Please provide copies of all audio tapes and video tapes made during each of the four discussions.

OCA/USPS-T1-20. The following refers to your testimony at page 10, lines 5 through 7. Please explain what you meant by the following: “drop shipment containers would be limited to three sizes per mailing”

- a. What are the three box sizes?
- b. What are the three envelope sizes?
- c. Can a mailing consist of boxes and envelopes?

OCA/USPS-T1-21. The following refers to page 10, lines 17 to 20 of your testimony. You indicate that the CMM mail piece must be “sufficiently flexible to withstand movement in the mailstream, the normal handling required for casing and delivery, and folding or rolling to fit in a small mail receptacle (such as a post office box).”

- a. USPS-LR-1 provides examples of a thin cardboard motorcycle and car cutout. However, the maximum thickness of a CMM mail piece is three-fourths of an inch. Please explain what materials you envision mailers using such that the material is sufficiently flexible when three-fourths of an inch thick.
- b. In order to understand the dimensional requirements for CMM mail, please provide four examples of CMM qualifying mail pieces that are three-fourths of an inch thick, 12 inches high and 15 inches long.
- c. In your testimony at page 10 and 11, you indicate that CMM mail pieces must be sufficiently flexible to fit into a small mail receptacle. Please explain why a sufficiently flexible mail piece that can fit into a small mail receptacle must be marked with a Carrier Release marking. (See also, USPS-T2, page 2, lines 11 through 14.) Include in your response examples of “sufficiently flexible mail pieces” that would not fit into a small mail receptacle.