

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-T1-28-30)
April 2, 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-T1-28. Please confirm that the Residual Shape Surcharge is generally assessed on non-letters and flats. If you are unable to confirm, please explain fully.

OCA/USPS-T1-29. The following refers to Tables 5 and 6 of USPS-LR-J-58, Docket No. R2001-1.

- a. Please confirm that the Test Year cost difference per piece for a Standard Mail parcel and a flat is \$0.936. If you are unable to confirm, please explain fully.
- b. Please confirm that the Test Year average per piece cost difference between flats and parcels due to differences in presorting and entry profiles is \$0.095 per piece. If you are unable to confirm, please explain fully.
- c. Please confirm that the Docket No. R2001-1, Test Year cost difference upon which the Residual Shape Surcharge is based is \$0.841 ($\$0.936 - \0.095). If you are unable to confirm, please explain fully and provide the correct values, cite all sources relied upon, provide copies of all source documents and show the derivation of all calculated numbers.
- d. Please confirm that the Residual Shape Surcharge of \$0.23 passes through approximately 27 percent (rounded) of the cost difference between flats and residual-shaped pieces ($\$0.23 / \0.841). If you are unable to confirm, please explain fully and provide the correct

values, cite all sources relied upon, provide copies of all source documents and show the derivation of all calculated numbers.

- e. Given that CMM is a new product offering, please explain fully why you believe passing through only 27 percent of the costs associated with the per piece Residual Surcharge is sufficient to ensure that other non-CMM Standard Mailers are not burdened with subsidizing CMM mail pieces.

OCA/USPS-T1-30. Please refer to your response to OCA/USPS-T1-6. You indicate that USPS professionals recall past occasions where they were asked about the “mailability of some variations of ‘CMM’ –round or circular mailpieces.”

- a. Would a $\frac{3}{4}$ inch thick, 12-inch diameter circle qualify as a CMM mail piece?
- b. If your response to part ‘a’ of this interrogatory is other than affirmative, please fully explain why the mail piece would not qualify.
- c. If a circular mailpiece could qualify as a CMM mailpiece, what would be the smallest diameter allowed?