

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS LESLIE M. SCHENK
(OCA/USPS-T27-1-6)
September 12, 1997

Pursuant to sections 25 and 26 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 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY DREIFUSS

Attorney

OCA/USPS-T27-1. Please refer to your direct testimony on page 3 where you state that non-advance deposit BRM recipients do not pay the postage due and per-piece fees through an advance deposit account, but may have postage “deducted from a Postage Due account.” Please also note the postage due account explanation at DMM S922.3.7.

- a. Please explain all other differences between advance deposit accounts and postage due accounts.
- b. Include in your discussion any differences in administration of the accounts (as administration is explained at page 7 of your direct testimony).
- c. For all differences discussed in response to (a) and (b) herein, explain whether Postal Service costs differ (e.g., different administration costs).

OCA/USPS-T27-2. Table 9 in LR H-179 lists “Reject Rate of BRM” on two types of automation sortation operations. Does this comprise the entire reject rate for BRM mail? Please explain. If it does not, please set forth the entire reject rate for BRM mail.

OCA/USPS-T27-3. Please refer to Appendix A: BRMAS Cost Survey – Data Collection and Processing. You state that a survey of the five sites was conducted in April-May, 1997. When were the tabulation of results and analysis thereof completed?

OCA/USPS-T27-4. When did you discover that the Postal Service no longer expected to have a new version of the BRMAS program in place during the test year?

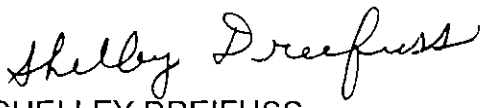
OCA/USPS-T27-5. Is the Postal Service currently surveying and analyzing BRMAS-qualified BRM productivity at a cross-section of postal facilities (or a selection of such facilities having "average" efficiency)?

- a. If not, why not?
- b. How long would such a survey and analysis thereof be expected to take?
- c. Confirm that using average productivity at relatively efficient sites overstates BRMAS productivity. If not confirmed, please explain.
- d. If (c) is confirmed, please provide an estimate of the magnitude of the overstated productivity, showing derivations for the estimate.

OCA/USPS-T27-6. Please refer to page 8 of your direct testimony where you state: "The cost of BRMAS-qualified BRM was developed in part using the results of another survey done at selected postal facilities." At page 10 you state: "The BRMAS Cost Survey is discussed in more detail in Appendix A." Does the "BRMAS Cost Survey" exist as a separate document? If so, please supply it.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY DREIFUSS
Attorney

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