

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Priority Mail Flat-Rate Box )

Docket No. MC2004-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS THOMAS M. SCHERER (OCA/USPS-T1-21-27)  
June 24, 2004

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-16 dated June 18, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-21. Please refer to your testimony at page 13. You explain that tabulation of flat-rate box volume will come from the ODIS-RPW sampling system.

- a. Please describe how the ODIS-RPW system will be used to generate total Priority Mail (PM) flat-rate box volumes for each 6-month period.
- b. How accurate will such volume counts be if the PM flat-rate box volume is quite low?
- c. For what annual volumes, by rate category, is ODIS-RPW considered to be robust?
- d. Is it possible that the PM flat-rate box volumes will be below the level considered to be robust?

OCA/USPS-T1-22. You state at page 13 of your testimony that “some ODIS-RPW system changes will be required.” Please describe fully all of the required changes.

OCA/USPS-T1-23. Please provide a copy of the section of the questionnaire that will be used by ODIS-RPW personnel to report PM flat-rate box data.

OCA/USPS-T1-24. Please provide a copy of the instructions that will be given to the ODIS-RPW personnel with respect to PM flat-rate box data collection.

OCA/USPS-T1-25. Please list fully all data that will be collected by the ODIS-RPW system with respect to PM flat-rate boxes.

OCA/USPS-T1-26. At page 14 of your testimony you state that your ultimate objective is to estimate net revenue and contribution impacts of the experiment. Do you agree that cost differences in offering a PM flat-rate box alternative may also have an impact

on contribution and net revenue? If you do not agree, please explain. If you do agree, then what steps do you plan to take to measure the impact of cost differences? What steps does the Postal Service plan to take to measure the impact of cost differences?

OCA/USPS-T1-27. Does the Postal Service intend to observe and report on operational differences in entering flat-rate PM versus pound/zone-rated PM? If not, why not.