

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268B0001

EXPERIMENTAL PRIORITY MAIL FLAT-RATE  
Box, 2004

Docket No. MC2004-2

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS LOETSCHER TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T3-7)  
(July 28, 2004)

The United States Postal Service hereby files witness Loetscher's responses to interrogatories of the Office of the Consumer Advocate: OCA/USPS-T3-7, filed on July 16, 2004.

The interrogatory is stated verbatim and is followed by the response. The substance of the cited response also reflects elaboration derived from discussion between counsel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

---

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS LOETSCHER TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T3-7** As a follow-up to the interrogatory OCA/USPS-T3-1-6 concerning the data collection study in Library Reference USPS-LR-2, do you know the accuracy and/or precision of the data collection effort, expressed in quantifiable terms?

- a. Assuming that your answer is affirmative, please provide a discussion, analysis, and quantification of your conclusions.
- b. If your answer is negative, please indicate why you believe the results should be used for purposes of pricing and recommending the experimental product.

**RESPONSE:**

See my response to DBP/USPS-T3-7.

## 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.

---

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -3084  
July 28, 2004