

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

Repositionable Notes Market Test )

Docket No. MC2004-5

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DARRON K. HOLLAND (OCA/USPS-T1- 1 - 8)  
(July 29, 2004)

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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in Complaint on PostECS, Docket No. C99-1). Specifically, "the party shall make the claim expressly and shall describe the nature

of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term “workpapers” shall include all backup material whether prepared manually,

mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-T1-1. Please state whether the Postal Service intends to apply current DMM requirements for Repositionable Notes (i.e., §§C810.7.0 – 7.6) to the proposed new classifications. If not, please indicate any planned changes.

OCA/USPS-T1-2. Please refer to DMM§C810.7.1.

- a. Is it correct that, currently, First-Class Mail, automation-compatible letters and cards can host qualifying Repositionable Notes (RPNs) free of charge? If this is not correct, please explain.
- b. Is it correct that, currently, Standard Mail automation-compatible letters can host qualifying RPNs free of charge? If this is not correct, please explain.
- c. Is it correct that, currently, First-Class Mail non-automation-compatible letters are not permitted to host qualifying RPNs? If this is not correct, please explain.
- d. Is it correct that, currently, First-Class Mail flats are not permitted to host qualifying RPNs? If this is not correct, please explain.
- e. Is it correct that, currently, First-Class Mail parcels are not permitted to host qualifying RPNs? If this is not correct, please explain.
- f. Is it correct that, currently, Standard Mail non-automation-compatible letters are not permitted to host qualifying RPNs? If this is not correct, please explain.
- g. Is it correct that, currently, Standard Mail flats are not permitted to host qualifying RPNs? If this is not correct, please explain.
- h. Is it correct that, currently, Standard Mail parcels are not permitted to host qualifying RPNs? If this is not correct, please explain.
- i. Is it correct that, currently, Periodicals Mail pieces are not permitted to host qualifying RPNs? If this is not correct, please explain.

OCA/USPS-T1-3. Please give the date that mailers were first permitted to attach Repositionable Notes (RPNs) to their First Class and Standard Mail pieces. Also give the Federal Register cite for the inaugural date for allowing RPNs.

OCA/USPS-T1-4. Please indicate which of the following can be mailed as hosts of Repositionable Notes (RPNs) under the RPN proposal:

- a. First Class
  - i. automation-compatible letters
  - ii. non-automation-compatible letters
  - iii. automation-compatible flats
  - iv. non-automation-compatible flats
  - v. parcels
- b. Standard Mail
  - i. automation-compatible letters
  - ii. non-automation-compatible letters
  - iii. automation-compatible flats
  - iv. non-automation-compatible flats
  - v. parcels
- c. Periodicals
  - i. automation-compatible letters
  - ii. non-automation-compatible letters
  - iii. automation-compatible flats
  - iv. non-automation-compatible flats

- d. For any of a.(i) – c.(iv.) above that will not be eligible to be an RPN host, please explain why not. Include in your explanation any operational impediments to including such types of mailpieces.

OCA/USPS-T1-5. Please provide the records and documentation of the results of the engineering and pilot test that are described at page 2, lines 2 – 14, of your testimony.

OCA/USPS-T1-6. Please provide the instructions to field and operations personnel for conducting the engineering and pilot tests described at page 2, lines 2 – 14.

OCA/USPS-T1-7. At page 2, lines 12 –13, you state that, “Field operations was asked to monitor whether RPNs affected any aspect of processing or delivery. No reports of such effects were received.”

- a. Did field operations personnel have an affirmative duty to report the absence of processing or delivery problems? Or were the operations personnel only required to make a report when problems were observed? Please explain.
- b. Please state the positions (or crafts) of the field operations personnel who were asked to monitor the effects of the RPNs on processing and delivery.
- c. How many such individuals submitted reports?

OCA/USPS-T1-8. Please refer to your testimony at page 7, lines 7 – 8. Please explain the procedures for reporting processing or delivery problems. Include in your explanation the following issues:

- a. Will there be forms for operations personnel to fill out and submit? Please explain. Also provide copies of any planned forms.

- b. Will operations personnel be asked to report that there were no problems?  
Please explain.
- c. Or will the data collection managers merely ask that reports be made only if problems were experienced? Please explain.
- d. If reports are made only when there are problems to report, how can data collections managers be certain that personnel have not merely followed the path of least resistance, i.e., not submitting the form (even if problems were experienced)?
- e. What are the positions of operations personnel who will be reporting on processing or delivery problems?
- f. Individuals in what types of positions will be responsible for collecting and reporting collected data?