

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

Rate and Service Changes to Implement )  
Functionally Equivalent Negotiated Service ) Docket No. MC2004-4  
Agreement with Discover Financial )  
Services, Inc. )

OFFICE OF THE CONSUMER ADVOCATE  
NOTICE OF ERRATA TO INITIAL BRIEF  
(September 9, 2004)

The Office of the Consumer Advocate (OCA) has five errata to the Initial Brief filed yesterday. Two of them arise from errata filed by the Postal Service to a spreadsheet Valpak submitted earlier in the instant proceeding (on August 5, 2004), i.e., as an attachment to interrogatory VP/USPS-T1-14. One of them incorporates an erratum filed by the Postal Service (on September 2, 2004) in response to POIR 5 in Docket No. MC2004-3. Two others reflect incorrect descriptions by OCA.

OCA based two statements in its Initial Brief on calculations performed using the spreadsheet Valpak attached to its interrogatory 14 to witness Ayub. Those statements are found at pages 11 and 14 of OCA's Initial Brief. Valpak attached a spreadsheet with the Initial Brief it filed yesterday. The 9/8/04 spreadsheet reflects errata submitted by witness Ayub on August 20, 2004, and September 3, 2004.

Page 33, footnote 58, of OCA's Initial Brief sets forth a calculation based on a cost figure obtained from witness Plunkett's Appendix A, page 1, line 6, "Manual Flat Returns Unit Cost." When witness Plunkett initially filed this spreadsheet, he used a flat

returns unit cost of \$1.06. This figure was used in OCA's footnote 58 of the brief. On September 1, 2004, witness Plunkett revised page 1 of Appendix A to correct a transposition error identified in POIR 5, Docket No. MC2004-3. The revised flat returns unit cost is \$1.04. The spreadsheet OCA attached to its Initial Brief contains the correct figure provided by witness Plunkett (on September 2, 2004) in his response to POIR No. 5. OCA feared that those attempting to reconcile footnote 58 with OCA's 9/8/04 spreadsheets would be puzzled by the discrepancy, hence the attached erratum.

Finally, page 21 of OCA's Initial Brief makes two incorrect statements. These were brought to OCA's attention by counsel for the Postal Service. Corrections are attached.

All changes noted above will be highlighted in a bold font on the revised pages of the Initial Brief.

Respectfully submitted,

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