

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

Experimental Premium Forwarding Service)

Docket No. MC2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS BETH B. ROTHSCHILD (OCA/USPS-T2-8-13)
January 11, 2005

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. Instructions included with OCA interrogatories OCA/USPS-T1-1-13 dated November 29, 2004, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-8. Please turn to your response to OCA/USPS-T2-1(a), wherein you state "...it has not been my responsibility to determine the relationship between consumers' responses to their likelihood of using the service or product to their actual subsequent usage of this product or service." Please confirm that this testimony indicates that you have no knowledge of whether your conclusions accurately predict actual future product usage due to a lack of confirmation between predicted and actual usage. If you do not confirm, please explain in detail.

OCA/USPS-T2-9. Please turn to your response to OCA/USPS-T2-1(a), wherein you state "...it has not been my responsibility to determine the relationship between consumers' responses to their likelihood of using the service or product to their actual subsequent usage of this product or service." Please reconcile this statement with the statement in your response to OCA/USPS-T2-1(c), "Based upon my more than 33 years in the survey research business, I have complete confidence in the market estimation approach used here."

OCA/USPS-T2-10. Please turn to your response to OCA/USPS-T2-3(a), wherein you state, "The size of the sub-sample (40,000 records) was chosen to ensure that the number of records with matched telephone numbers would be large enough to obtain a sufficient number of interviews from the Temporary Forwarding stratum." Please explain the statistical techniques used in defining and determining the quantity associated with "large enough".

OCA/USPS-T2-11. Please turn to your response to OCA/USPS-T2-4(a) wherein you state, "In the absence of design effects and assuming that 10 percent of those surveyed would be likely to use the service...."

(a) Please explain what you mean by "design effects", how "design effects" is computed, and the implications of changes in "design effects."

(b) Please explain the basis for the assumption that 10 percent of those surveyed would be likely to use the service, as opposed to, for example, 5 percent or 15 percent.

OCA/USPS-T2-12. Please turn to your response to OCA/USPS-T2-6(a), wherein you state, "I believe that the sample of completed interviews is statistically accurate...."

Please provide the statistical calculations underlying and substantiating your statement.

OCA/USPS-T2-13. Please turn to your response to OCA/USPS-T2-7(b), wherein you discuss the "awareness" adjustment. Please explain the justification for the size of the adjustment.