

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2005 )

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE (OCA/USPS-1-2)  
(April 12, 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 an OCA interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

Shelley S. Dreifuss, Director  
Office of the Consumer Advocate

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6830; Fax (202) 789-6819  
e-mail: dreifusss@prc.gov

OCA/USPS-1. Please use data from the instant rate proceeding to update the following figures used by witness Dauer, in USPS-T-1, Docket No. MC2005-2 :

- a. Appendix A, page 1, line 3: "USPS FCM average return rates" = 1.23 percent
- b. Appendix A, page 1, line 5, column 1: "Manual Letter Returns Unit Cost" = 57 cents in Year 1. (Also specify which fiscal year is "Year 1").
- c. Appendix A, page 1, line 5, column 2: "Manual Letter Returns Unit Cost" = 60 cents in Year 2.
- d. Appendix A, page 1, line 5, column 3: "Manual Letter Returns Unit Cost" = 62 cents in Year 3.
- e. Appendix A, page 1, line 6, column 1: "Electronic Letter Returns Unit Cost" = 36 cents in Year 1.
- f. Appendix A, page 1, line 6, column 2: "Electronic Letter Returns Unit Cost" = 37 cents in Year 2.
- g. Appendix A, page 1, line 6, column 3: "Electronic Letter Returns Unit Cost" = 39 cents in Year 3.

OCA/USPS-2. Postmaster General Potter made the Keynote Address at the 2005 Nashville Postal Forum on March 21, 2005. He announced, as a goal for an extended Transformation Plan, that: "In the near term . . . . I also want us to cut by 50 percent the amount of undeliverable as addressed (UAA) mail." (See [http://www.usps.com/communications/news/speeches/2005/sp05\\_0321pmg.htm](http://www.usps.com/communications/news/speeches/2005/sp05_0321pmg.htm) )

- a. Please give a qualitative description of the effects of a 50 percent reduction in UAA mail on NSAs that are functionally equivalent to the Capital One NSA.

b. Isn't it correct that steps taken to reduce the average amount of UAA mail are likely to reduce the total amount of savings that can be achieved in NSA agreements that are functionally equivalent to the Capital One NSA? Please explain any negative answer.