

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

Postal Rate and Fee Changes

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Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE (OCA/USPS-7-8)
(April 29, 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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-7. The Postal Service filed Library Reference K-82 consisting of ODIS-RPW reports for the 4 quarters of FY2004 on April 8, 2005, as part of the Docket No. R2005-1 filing.

- a. Please confirm that none of these quarterly reports was filed in conformance with Commission Rule 102, 39 C.F.R. §3001.102, which provides: “Each report listed in this section shall be filed with the Secretary of the Commission within two weeks of its presentation for use by postal management (b) *Quarterly reports.* The following information will be filed by the Postal Service quarterly: . . . (2) Origin/Destination Information Report National Service Index;” i.e., none were filed on a quarterly basis throughout FY2004. If this statement is not confirmed, then please explain.
- b. Confirm that, prior to the filing of LR K-82, the last ODIS quarterly report filed with the Commission was for Quarter 4, FY 2003, and was filed on October 20, 2003. If this statement is not confirmed, then please explain.
- c. Confirm that no quarterly ODIS reports were filed with the Commission for a period of nearly 1 ½ years. If this statement is not confirmed, then please explain.
- d. Please provide the date that the ODIS-RPW systems were first merged.
- e. Confirm that, even following the merger of the ODIS-RPW systems, 3 quarterly RPW reports were filed with the Commission, i.e., on April 16, 2004 (Quarter 1, FY2004); May 14, 2004 (Quarter 2, FY2004); and August 6, 2004 (Quarter 3, FY2004).

- f. Give a detailed explanation of why the Postal Service filed 3 RPW quarterly reports in FY2004, but did not file any ODIS reports.
- g. Has the Postal Service filed any quarterly ODIS-RPW reports with the Commission for FY2005? If not, why not.
- h. Does the Postal Service intend to comply with Commission Rule 102 by filing quarterly ODIS or ODIS-RPW reports in the future? If not, why not? If so, what will be the filing schedule?
- i. Please provide ODIS or ODIS-RPW reports for Quarters 1 and 2 of FY2005. Please provide Quarter 3 and 4 reports for FY2005 immediately after they are prepared. File them as Library References in the current rate case or under the periodic reporting rule.

OCA/USPS-8. Please confirm that Christensen Associates has performed a study on UAA mail and address quality that was to be completed by the end of 2004. If this statement is not confirmed, then please supply the information needed to make the statement correct.

- a. Please provide any information generated by this study (even if only preliminary) on the costs to the Postal Service of defective addresses on mail.
- b. Please provide any information generated by this study (even if only preliminary) on the costs to the Postal Service of mail that is undeliverable as addressed because the addressee has moved.