

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-43-54)
(May 13, 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-43. Please list every domestic retail service sold by the Postal Service to the public, on a nationwide basis, that is not contained within the Domestic Mail Classification Schedule. This interrogatory applies to all services currently offered by the Postal Service to the public, including philatelic services. This interrogatory also applies to any services made available to the public since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such services were terminated prior to the filing of this set of interrogatories.

- a. Provide a detailed description of the service.
- b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. On what date was this service first offered to the public?
- e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
- f. Provide a description of the primary purchasers of the service.
- g. Provide a complete description of the activities performed by the Postal Service in providing the service.
- h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.

- i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
- j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
- k. Submit all of the annual revenues earned by the Postal Service in providing the service.
- l. Submit annual volume figures for each service, by billing determinant.
- m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- n. Submit total revenues for the service for the entire period since the service was first made available to the public.
- o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- p. Submit total net income (loss) figures for the service since the service was first made available to the public.
- q. Give a precise citation in the current filing for every figure submitted in parts j. – p.

- r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-44. Please list every domestic retail service sold by the Postal Service to the public, on a regional basis, that is not contained within the Domestic Mail Classification Schedule. This interrogatory applies to all services currently offered by the Postal Service to the public. This interrogatory also applies to any services made available to the public since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such services were terminated prior to the filing of this set of interrogatories.

- a. Provide a detailed description of the service.
- b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.

- c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. On what date was this service first offered to the public?
- e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
- f. Provide a description of the primary purchasers of the service.
- g. Provide a complete description of the activities performed by the Postal Service in providing the service.
- h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
- i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
- j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
- k. Submit all of the annual revenues earned by the Postal Service in providing the service.
- l. Submit annual volume figures for each service, by billing determinant.

- m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- n. Submit total revenues for the service for the entire period since the service was first made available to the public.
- o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- p. Submit total net income (loss) figures for the service since the service was first made available to the public.
- q. Give a precise citation in the current filing for every figure submitted in parts j. – p.
- r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-45. Please list every domestic retail service sold by the Postal Service to the public, on a local basis, that is not contained within the Domestic Mail Classification Schedule. This interrogatory applies to all services currently offered by the Postal

Service to the public. This interrogatory also applies to any services made available to the public since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such services were terminated prior to the filing of this set of interrogatories.

- a. Provide a detailed description of the service.
- b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. On what date was this service first offered to the public?
- e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
- f. Provide a description of the primary purchasers of the service.
- g. Provide a complete description of the activities performed by the Postal Service in providing the service.
- h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
- i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.

- j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
- k. Submit all of the annual revenues earned by the Postal Service in providing the service.
- l. Submit annual volume figures for each service, by billing determinant.
- m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- n. Submit total revenues for the service for the entire period since the service was first made available to the public.
- o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- p. Submit total net income (loss) figures for the service since the service was first made available to the public.
- q. Give a precise citation in the current filing for every figure submitted in parts j. – p.
- r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records,

worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-46. Please list every pilot test of a potential domestic postal retail service currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any pilot tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to pilot tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the pilot test.
- b. For each pilot test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each pilot test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the pilot test and describe the nature of their business.
- e. State the geographic scope of the pilot test.
- f. State the criteria for allowing certain mailers (or recipients) to participate, but not others.

- g. Have any mailers (or recipients) asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the pilot test? How are they affected?
- i. On what date was this pilot test initiated?
- j. Is this pilot test still being conducted? If not, when was the pilot test discontinued? State the reasons for discontinuing the pilot test.
- k. Provide a description of the primary intended users of the potential service.
- l. Provide a complete description of the activities performed by the Postal Service in conducting the pilot test.
- m. Submit each rate or fee, if any, charged under the pilot test.
- n. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each pilot test that has been terminated or discontinued.
- o. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the pilot test.
- p. Submit annual volume figures for each pilot test, if any, by billing determinant.

- q. Submit annual net income (loss) figures, if any, for the pilot test since the pilot test was first initiated.
- r. Submit total revenues for the pilot test, if any, for the entire period since the pilot test was first initiated.
- s. Submit total costs (both start-up and operating) for the entire period since the pilot test was first initiated.
- t. Submit total net income (loss) figures for the pilot test since the pilot test was first initiated.
- u. Give a precise citation in the current filing for every figure submitted in parts n. – t.
- v. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

OCA/USPS-47. Please list every pilot test of a potential domestic retail service, considered not of a type to be included in the Domestic Mail Classification Schedule, currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any pilot tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to pilot tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the pilot test.

- b. For each pilot test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each pilot test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the pilot test and describe the nature of their business.
- e. State the geographic scope of the pilot test.
- f. State the criteria for allowing certain companies, organizations, agencies, or individuals to participate, but not others.
- g. Have any companies, organizations, agencies, or individuals asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the pilot test? How are they affected?
- i. Is the pilot test activity considered a substitute for other mail products or services? Please explain.
- j. On what date was this pilot test initiated?
- k. Is this pilot test still being conducted? If not, when was the pilot test discontinued? State the reasons for discontinuing the pilot test.
- l. Provide a description of the primary intended users of the potential service.

- m. Provide a complete description of the activities performed by the Postal Service in conducting the pilot test.
- n. Submit each rate or fee, if any, charged under the pilot test.
- o. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each pilot test that has been terminated or discontinued.
- p. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the pilot test.
- q. Submit annual volume figures for each pilot test, if any, by billing determinant.
- r. Submit annual net income (loss) figures, if any, for the pilot test since the pilot test was first initiated.
- s. Submit total revenues for the pilot test, if any, for the entire period since the pilot test was first initiated.
- t. Submit total costs (both start-up and operating) for the entire period since the pilot test was first initiated.
- u. Submit total net income (loss) figures for the pilot test since the pilot test was first initiated.
- v. Give a precise citation in the current filing for every figure submitted in parts o. – u.

- w. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- x. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-48. Please list every operations test of a potential domestic postal retail service currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any operations tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such operations tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to operations tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the operations test.
- b. For each operations test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.

- c. For each operations test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the operations test and describe the nature of their business.
- e. State the geographic scope of the operations test.
- f. State the criteria for allowing certain mailers (or recipients) to participate, but not others.
- g. Have any mailers (or recipients) asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the operations test? How are they affected?
- i. On what date was this operations test initiated?
- j. Is this operations test still being conducted? If not, when was the operations test discontinued? State the reasons for discontinuing the operations test.
- k. Provide a description of the primary intended users of the potential service.
- l. Provide a complete description of the activities performed by the Postal Service in conducting the operations test.
- m. Submit each rate or fee, if any, charged under the operations test.

- n. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the operations test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each operations test that has been terminated or discontinued.
- o. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the operations test.
- p. Submit annual volume figures for each operations test, if any, by billing determinant.
- q. Submit net income (loss) figures, if any, for the operations test since the operations test was first initiated.
- r. Submit total revenues for the operations test, if any, for the entire period since the operations test was first initiated.
- s. Submit total costs (both start-up and operating) for the entire period since the operations test was first initiated.
- t. Submit total net income (loss) figures for operations test since the operations test was first initiated.
- u. Give a precise citation in the current filing for every figure submitted in parts n. – t.
- v. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

OCA/USPS-49. Please list every operations test of a potential domestic retail service, considered not of a type to be included in the Domestic Mail Classification Schedule, currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any operations tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to operations tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the operations test.
- b. For each operations test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each operations test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the operations test and describe the nature of their business.
- e. State the geographic scope of the operations test.
- f. State the criteria for allowing certain companies, organizations, agencies, or individuals to participate, but not others.
- g. Have any companies, organizations, agencies, or individuals asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.

- h. What classes, and/or postal services or products, are potentially affected by the operations test? How are they affected?
- i. Is the operations test activity considered a substitute for other mail products or services? Please explain.
- j. On what date was this operations test initiated?
- k. Is this operations test still being conducted? If not, when was the operations test discontinued? State the reasons for discontinuing the operations test.
- l. Provide a description of the primary intended users of the potential service.
- m. Provide a complete description of the activities performed by the Postal Service in conducting the operations test.
- n. Submit each rate or fee, if any, charged under the operations test.
- o. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the operations test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each operations test that has been terminated or discontinued.
- p. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the operations test.
- q. Submit annual volume figures for each operations test, if any, by billing determinant.

- r. Submit annual net income (loss) figures, if any, for the operations test since the operations test was first initiated.
- s. Submit total revenues for the operations test, if any, for the entire period since the operations test was first initiated.
- t. Submit total costs (both start-up and operating) for the entire period since the operations test was first initiated.
- u. Submit total net income (loss) figures for the operations test since the operations test was first initiated.
- v. Give a precise citation in the current filing for every figure submitted in parts o. – u.
- w. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- x. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-50. Please provide each of the following four reports:

USPS First, Second, Third, and Fourth Annual Reports for FY 2001 – 2004, submitted in Response to the General Accounting Office Report of December 21, 2001, titled US

Postal Service: Update on E-Commerce Activities and Privacy Protections (GAO-02-79).

If the Postal Service so chooses, these may be filed under protective conditions.

OCA/USPS-51. Please re-submit Attachment 1 to the Postal Service's response to interrogatory OCA/USPS-239, Docket No. R2001-1, dated December 17, 2001, with additional columns for all quarters since QIII, FY 2001, through the most recent quarter.

- a. What is the "SEDS" umbrella suite of services that is cited in footnote 1 of the attachment?
- b. Please list every discrete service in the "SEDS" umbrella suite of services.
- c. For every discrete service in the "SEDS" umbrella suite of services provide the following (please provide the information requested below separately for PostECS; and Electronic Postmark):
 - i. Provide a detailed description of the service.
 - ii. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
 - iii. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
 - iv. On what date was this service first offered to the public?
 - v. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
 - vi. Provide a description of the primary purchasers of the service.

- vii. Provide a complete description of the activities performed by the Postal Service in providing the service.
- viii. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
- ix. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
- x. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
- xi. Submit all of the annual revenues earned by the Postal Service in providing the service.
- xii. Submit annual volume figures for each service, by billing determinant.
- xiii. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- xiv. Submit total revenues for the service for the entire period since the service was first made available to the public.
- xv. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.

- xvi. Submit total net income (loss) figures for the service since the service was first made available to the public.
- xvii. Give a precise citation in the current filing for every figure submitted in parts j. – p.
- xviii. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- xix. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

OCA/USPS-52. Please re-submit Attachment 1 to the Postal Service's response to interrogatory OCA/USPS-240, Docket No. R2001-1, dated December 17, 2001, (which provided information for FirstClass Phone Cards; Retail Merchandise; PostOffice Online; LibertyCash; Dinero Seguro; REMITCO; and Sure Money), with additional columns for all quarters since the period included in the "FY 2001" column, through the most recent quarter.

- a. Provide a detailed description of each service listed in the Attachment.

- b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. On what date was this service first offered to the public?
- e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
- f. Provide a description of the primary purchasers of the service.
- g. Provide a complete description of the activities performed by the Postal Service in providing the service.
- h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
- i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
- j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.

- k. Submit all of the annual revenues earned by the Postal Service in providing the service.
- l. Submit annual volume figures for each service, by billing determinant.
- m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- n. Submit total revenues for the service for the entire period since the service was first made available to the public.
- o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- p. Submit total net income (loss) figures for the service since the service was first made available to the public.
- q. Give a precise citation in the current filing for every figure submitted in parts j. – p.
- r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services listed in Attachment 1 have been allocated to the (1) DMCS group and (2) the Attachment 1 group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

- t. Attachment 1, as filed on December 17, 2001, appears to have an addition error for LibertyCash, in the line for "Cumulative Balance", and the column "Since Inception." OCA calculates the Cumulative Balance Since Inception at \$4,246,492. If, indeed, an incorrect figure was included in the Attachment to interrogatory 240, then please use a corrected figure in responding to the instant interrogatory.

OCA/USPS-53. Please refer to Attachment F of the Request, at pages 14 -15. There are 5 unnumbered paragraphs on these pages. For nonpostal services involving window clerk activity (unnumbered paragraph 3), provide all calculations, worksheets, and primary sources for the total expense figure of \$123 million in FY04.

- a. Please provide the IOCS questions that separately identify "nonpostal" services.
- b. Include all of the accounting expense data referred to in unnumbered paragraph 3.
- c. Display data separately for each discrete "nonpostal" service and show how they sum to the \$123 million total.
- d. Separately identify development costs for each "nonpostal" service and in total.
- e. Separately identify start-up costs for each "nonpostal" service and in total.
- f. Separately identify capital costs for each "nonpostal" service and in total.
- g. Separately identify common and joint costs for each "nonpostal" service and in total. Include all calculations, worksheets, and primary sources for

the allocation of joint and common costs between DMCS services and “nonpostal” services.

- h. Separately identify costs associated with each “nonpostal” service that has been terminated or discontinued and in total.
- i. For nonpostal services involving window clerk activity, provide all calculations, worksheets, and primary sources for the total revenue figure of \$239 million in FY04.
- j. Provide all comparable data requested in this interrogatory, including parts a. – i., for Fiscal Years 2001, 2002, 2003, and the most recent quarters of 2005.
- k. Provide test year estimates, i.e., FY2006, by discrete “nonpostal” service and in total, for expenses and revenues. Explicitly state all assumptions made in developing these estimates. Provide all calculations, worksheets, and primary sources used to develop the estimates.

OCA/USPS-54. For nonpostal services with no associated window clerk activity (unnumbered paragraph 4), provide all calculations, worksheets, and primary sources for the total expense figure of \$7 million in FY04.

- a. Include all of the accounting expense data referred to in unnumbered paragraph 4.
- b. Display data separately for each discrete “nonpostal” service and show how they sum to the \$7 million total.
- c. Separately identify development costs for each “nonpostal” service and in total.

- d. Separately identify start-up costs for each “nonpostal” service and in total.
- e. Separately identify capital costs for each “nonpostal” service and in total.
- f. Separately identify common and joint costs for each “nonpostal” service and in total. Include all calculations, worksheets, and primary sources for the allocation of joint and common costs between DMCS and “nonpostal” services.
- g. Separately identify costs associated with each “nonpostal” service that has been terminated or discontinued and in total.
- h. For nonpostal services with no associated window clerk activity, provide all calculations, worksheets, and primary sources for the total revenue figure of \$44 million in FY04.
- i. Provide all comparable data requested in this interrogatory, including parts a. – i., for Fiscal Years 2001, 2002, 2003, and the most recent quarters of 2005.
- j. Provide test year estimates, i.e., FY2006, by discrete “nonpostal” service and in total, for expenses and revenues. Explicitly state all assumptions made in developing these estimates. Provide all calculations, worksheets, and primary sources used to develop the estimates.