

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

Postal Rate and Fee Changes)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL D. BRADLEY (OCA/USPS-T14-25)
May 18, 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 an interrogatory and request 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-T14-25. Please refer to Library Reference USPS-LR-K-81. The three databases TIMEPOOL MDATA.PRN, LfvOLUME MDATA.PRN, AND PAVOLUME MDATA.PRN each have a variable denoted as "ZIP".

- a. Please confirm that the numbering is consistent between databases, i.e., that ZIP 2222220 is the identical ZIP Code between databases.
- b. The ZIP Codes in Density appear to be different in some cases from those in the three previously mentioned databases. Please confirm that the ZIP Codes in Density are consistent with the ZIP Codes in the other three databases.
- c. The ZIP Codes in PA159.PRN and AL161ZIPS.PRN do not immediately appear to be consistent with the databases TIMEPOOL MDATA.PRN, LfvOLUME MDATA.PRN, AND PAVOLUME MDATA.PRN. Please explain how the ZIP Codes are related. If the ZIP Codes are not related, please explain the use of PA159.PRN and AL161ZIPS.PRN.