

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
WITNESS KAREN MEEHAN (OCA/USPS-T9-3-4)
(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 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-T9-3. The following refers to USPS-LR-K-4, file name "BY04.cntl," spreadsheet "Comp Master". One of the spreadsheet's column headings includes the acronym "GDEI." Please explain what "GDEI" stands for.

OCA/USPS-T9-4. The following interrogatory refers to USPS-LR-K-5, Workpaper B, filename "CS03.xls," spreadsheet "Outputs to CRA," and USPS-LR-K-4, filename "BY04.I.xls"

- a. Please explain why not all values for the classes and subclasses of mail in filename "CS03.xls" equal those values shown in USPS-LR-K-4, filename "BY04.I.xls." For example, consider USPS component 35. In Workpaper B, filename "CS03.xls," spreadsheet "Outputs to CRA," the value for First-Class single-piece letters in the column labeled "Mail Processing" is \$4,221,961 (\$000), EXCEL line 11, column D. The value identified in USPS-LR-K-4, filename "BY04.I.xls," line number 38, column CZ, is \$4,280,428 (\$000).
- b. If your response to part a indicates that the values for component 35 in the file named "CS03.xls," spreadsheet "Outputs to CRA," are subsequently redistributed on the basis of one or more distribution keys, please identify the appropriate distribution key(s) and indicate where in the USPS Base Year model those calculations are performed. If the calculations are not performed in the model, please indicate where the values are derived. In your response, show the derivation of all calculated values and cite all sources. Please provide a copy of all source documents not previously filed in this docket.