

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
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS JOHN E. POTTER
(OCA/USPS-T1-4)
(June 10, 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-T1-4. Please confirm that it is still your intention to withdraw the current rate request if Congress relieves the Postal Service of its obligation to make a \$3.1 billion escrow payment in FY 2006, before a recommended decision is issued by the Commission in this docket. USPS-T-1 at 7.

- a. If you do not confirm, then please explain.
- b. In the June 10, 2005, issue of DM News, in an article written by Scott Hovanyetz, Jerry Cerasale, senior vice president of governmental affairs for DMA, is cited for the statement that, if President Bush signs such a bill by early November, the Postal Service might cut the rate increase in half or push it back a few months. Do you contemplate taking the actions described by Mr. Cerasale if the bill is signed prior to the issuance of a recommended decision by the Commission? If so, then please reconcile your answer to part b. of this question with your answer to part a.
- c. If such a bill is signed prior to the issuance of a recommended decision in this docket and you plan, not to withdraw the request, but to request cutting the rate increase in half, would the Postal Service amend its request? Re-file it? Please explain.
- d. If the Commission recommends a 5.4 percent increase in this docket, and the President signs such a bill *after* the Commission issues its recommended decision, would you consider raising rates less than 5.4 percent, say, to only 2.7 percent? If so, please explain the steps you would take to accomplish this.