

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

Postal Rate and Fee Changes )

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DENNIS P. STEVENS (OCA/USPS-T15-18-20)  
June 17, 2005

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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-T15-18. Please refer to your answer to ADVO/USPS-T15-8(a). Did you examine whether on any specific day any city routes normally sampled were not included in the routes sampled for the specific day due to higher than normal delivery volumes.

- a. If your answer is affirmative, please discuss in detail.
- b. If your answer is negative, please explain why this analysis was not performed and provide information on the volume for the specific days for routes omitted from the sample.

OCA/USPS-T15-19. Please refer to your answer to ADVO/USPS-T15-6(b). Please indicate why no delivery mode has been assigned to the referenced routes.

OCA/USPS-T15-20. Please refer to your response to ADVO/USPS-T15-5(d). Please provide any data, studies, memoranda, or position papers not already provided that substantiate your statement, "The USPS has concluded that the invalid scan rate is de minimis . . . ." Please also provide citations to the statistical, sampling, economic, survey, and/or other professional literature as appropriate and available.