

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-183-185)
(June 23, 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-183. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

- a. For BY 2000, please confirm that the cost associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost is \$795,000 (\$2,486,000 - \$1,691,000). If you do not confirm, please explain.
- b. For BY 2004, please confirm that the cost associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost is \$2,782,000 (\$4,883,000 - \$2,101,000). If you do not confirm, please explain.
- c. For BY 2000, please confirm that the total cost for Registered Mail is \$83,824,000 based on the costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2000
	\$
C/S 1	375
CS/2	4,133
CS/3	43,556
C/S 4	56
C/S 6	1,047
C/S 7	5,337
C/S 10	1,691
C/S 11	4,722
C/S 12	141
C/S 13	12
C/S 15	4,946
C/S 16	2,031
C/S 18	5,132
C/S 20	10,645
TOTAL	83,824

- d. For BY 2004, please confirm that the total cost for Registered Mail is \$78,487,000 based on the costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2004
	\$
C/S 1	303
CS/2	4,341
CS/3	46,975
C/S 4	51
C/S 6	1,459
C/S 7	5,692
C/S 10	2,101
C/S 11	3,489
C/S 12	306
C/S 13	3
C/S 15	3,528
C/S 16	2,150
C/S 18	3,408
C/S 20	4,681
TOTAL	78,487

- e. For BY 2000, please confirm that the C/S 10 Unit Cost figure of \$0.19 was calculated using a total Registered Mail volume of 8,913,000. If you do not confirm, please explain.
- f. For BY 2004, please confirm that the C/S 10 Unit Cost figure of \$0.42 was calculated using a total Registered Mail volume of 5,008,595. If you do not confirm, please explain.
- g. After removing the costs associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs for BY 2000 and BY 2004, please discuss the causes of the 121.1 percent increase in C/S10 volume variable Registry costs.

OCA/USPS-184. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

- a. Please confirm that for Fiscal Years 2001, 2002, and 2003, the Postal Service inadvertently included the costs associated with international Registered Mail pieces in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost. If you do not confirm, please explain. If you do confirm, please provide for each fiscal year the correct domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs, and the correct domestic Registered Mail costs for all other cost segments.
- b. To what extent has the Postal Service inadvertently included the costs associated with international Registered Mail pieces in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs for fiscal years prior to BY 2000? Please explain.

OCA/USPS-185. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

- a. For BY 2000, please confirm that under the PRC Costing Methodology, the domestic Registered Mail C/S10 (Rural Carrier) cost would be \$1,691,000. If you do not confirm, please explain and provide the correct figure.
- b. For BY 2004, please confirm that under the PRC Costing Methodology, the domestic Registered Mail C/S10 (Rural Carrier) cost would be \$2,101,000. If you do not confirm, please explain and provide the correct figure.
- c. For BY 2000, please confirm that under the PRC Costing Methodology, the total cost for Registered Mail is \$60,790,000 based on the Commission costs

for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2000
	PRC
	\$
C/S 1	375
CS/2	2,634
CS/3	24,993
C/S 4	20
C/S 6	1,047
C/S 7	5,152
C/S 10	1,691
C/S 11	4,848
C/S 12	171
C/S 13	11
C/S 15	4,880
C/S 16	1,427
C/S 18	3,546
C/S 20	9,995
TOTAL	60,790

d. For BY 2004, please confirm that under the PRC Costing Methodology, the total cost for Registered Mail is \$50,227,000 based on the Commissions costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2004
	PRC
	\$
C/S 1	303
CS/2	2,261
CS/3	20,893
C/S 4	15
C/S 6	1,200
C/S 7	4,848
C/S 10	2,101
C/S 11	4,722
C/S 12	208
C/S 13	5
C/S 15	4,742
C/S 16	1,375
C/S 18	2,091
C/S 20	5,463
TOTAL	50,227