

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 FOLLOW-UP
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS KAREN MEEHAN (OCA/USPS-T9-7)
(June 24, 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-T9-7. Please refer to your response to OCA/USPS-T9-6(c). Your response calculates a unit cost change based upon a revised total BY 2004 volume variable cost for Registered Mail of \$77,999,150, citing Footnote 1, which references your testimony, USPS-T-9, at new page 14, entitled "Base Year 2004 Supplemental Information on Registered Mail."

- a. Please confirm that the unit cost change between BY 2000 and BY 2004 is 65.59 percent ($(\$77,999,150 / 5,008,595) / (\$83,824,000 / 8,913,000) - 1$). If you do not confirm, please explain.
- b. Please confirm that the Revised Total BY 2004 Volume Variable cost for Registry of \$77,999,150 can be calculated as follows: $(\$81,268 - ((\$4,883 - \$2,101) * 1.175))$. If you do not confirm, please explain.
- c. Please confirm that the piggyback factor of 1.175 applied to the difference between the as filed and revised BY 2004 C/S10 rural carrier costs of \$4,883,000 and \$2,101,000, respectively, accounts for all changes in each of the cost segments of Registered Mail.
- d. To calculate the Revised Total BY 2004 Volume Variable cost for Registry of \$77,999,150, please provide an algebraic equation demonstrating that the piggyback factor of 1.175 applied to the difference between the as filed and revised BY 2004 C/S10 rural carrier costs of \$4,883,000 and \$2,101,000, respectively, accounts for all changes in each of the cost segments of Registered Mail. Please show all calculations and provide citations for all figures used.