

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

COMPELLED RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE OCA (OCA/USPS-43, 46-49, 54)  
(August 5, 2005)

Pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2005), the United States Postal Service hereby provides compelled responses to the following interrogatories of the OCA, filed on May 13, 2005: OCA/USPS-43, 46-49, 54. In accordance with that ruling, the responses to 43, 46, and 54 expand on the answers to those questions filed on June 2, 2005, but do not necessarily replace them. The header on these responses indicates that they are expanded responses, to distinguish them from those filed earlier. No previous answers have been filed to questions 47-49.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 5, 2005

## **EXPANDED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA**

OCA/USPS-43. Please list every domestic retail service sold by the Postal Service to the public, on a nationwide basis, that is not contained within the Domestic Mail Classification Schedule. This interrogatory applies to all services currently offered by the Postal Service to the public, including philatelic services. This interrogatory also applies to any services made available to the public since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such services were terminated prior to the filing of this set of interrogatories.

- a. Provide a detailed description of the service.
- b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. On what date was this service first offered to the public?
- e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
- f. Provide a description of the primary purchasers of the service.
- g. Provide a complete description of the activities performed by the Postal Service in providing the service.
- h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
- i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
- j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
- k. Submit all of the annual revenues earned by the Postal Service in providing the service.
- l. Submit annual volume figures for each service, by billing determinant.
- m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
- n. Submit total revenues for the service for the entire period since the service was first made available to the public.
- o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
- p. Submit total net income (loss) figures for the service since the

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- service was first made available to the public.
- q. Give a precise citation in the current filing for every figure submitted in parts j. – p.
  - r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
  - s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

### **RESPONSE:**

This expanded response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to review the information previously provided in response to OCA/USPS-53, specifically address whether that material covers all nonpostal services, and provide additional information as necessary.

In general, except as discussed below, the information initially provided in response to OCA/USPS-53 does cover all nonpostal services offered during the base year.

#### Photocopy Service

The Postal Service permits the installation of coin-operated photocopying machines in the lobbies of offices for customer use in many areas. The machines are owned and maintained by commercial firms, which are selected on a competitive basis. A portion of the proceeds from these machines is paid to the Postal Service. Gross revenue from such machines in FY04 was

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\$17,438(000). The Postal Service's share of gross revenue differs based on local agreements, and therefore a comprehensive net revenue figure is not available.

### Unisite Antenna Program

This no longer exists as a discrete alliance program. (Even when it did exist, of course, it would never have been considered a "retail" program by any definition of that term.) While the Postal Service still leases space on its property for antenna towers, such arrangements are done on an *ad hoc* basis, and the associated revenue is treated as other lease revenue.

### Passport Photos

Contrary to the OCA's insinuations, the response to OCA/USPS-53 did not ignore passport photos. In fact, as even acknowledged in the OCA's Motion to Compel at 18, the Postal Service's description in Attachment Two to that response clearly indicated that photo service was included as part of the information provided. Thus, the FY04 passport revenue reported in Attachment One, as correctly surmised in Ruling No. 58, is the sum of the passport application revenue, and passport photo revenue.

The situation with expenses is less clear. It would not be possible to state with certainty that no passport photo clerk time expense is included with the reported passport expense unless it was known with certainty that, when sampling a clerk taking a passport photo at the time of the reading, no IOCS data collector ever recorded that tally as passport. To the extent that such situations arose, some data collectors may have handled it one way, other may have

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handled it differently. To clarify such situations, starting in FY06, the IOCS will have separate entries for passport application and passport photo. With respect to FY04, however, out of concerns that the available IOCS information might relate to both passport applications and passport photos, the response to OCA/USPS-53 treated passports as an aggregate.

In the course of preparing this expanded response, however, it was determined that \$155(000) of FY04 expense for camera purchases was not included in the passport expense amount reported in Attachment One. (Similarly, the FY03 passport expense number does not include camera purchases of \$971(000) made in that year.) There may also be additional amounts for equipment and supplies relating to passport photos that were incurred by local offices and booked under other account numbers. Those figures, while believed to be relatively minor, are not available.

### Phone Cards

Ruling No. 58 requested clarification of the discrepancy in FY04 revenue reported for phone cards between Attachment One to OCA/USPS-53, and POIR No. 5, Question 15. The \$12.2 million reported in the POIR response was a gross alliance revenue amount, while the \$8.1 million reported in Attachment One was a net revenue amount to the Postal Service, with the balance of the \$12.2 million going to the alliance partner for the cost of the phone cards.

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OCA/USPS-46. Please list every pilot test of a potential domestic postal retail service currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any pilot tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to pilot tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the pilot test.
- b. For each pilot test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each pilot test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the pilot test and describe the nature of their business.
- e. State the geographic scope of the pilot test.
- f. State the criteria for allowing certain mailers (or recipients) to participate, but not others.
- g. Have any mailers (or recipients) asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the pilot test? How are they affected?
- i. On what date was this pilot test initiated?
- j. Is this pilot test still being conducted? If not, when was the pilot test discontinued? State the reasons for discontinuing the pilot test.
- k. Provide a description of the primary intended users of the potential service.
- l. Provide a complete description of the activities performed by the Postal Service in conducting the pilot test.
- m. Submit each rate or fee, if any, charged under the pilot test.
- n. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each pilot test that has been terminated or discontinued.
- o. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the pilot test.
- p. Submit annual volume figures for each pilot test, if any, by billing determinant.
- q. Submit annual net income (loss) figures, if any, for the pilot test since the pilot test was first initiated.

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- r. Submit total revenues for the pilot test, if any, for the entire period since the pilot test was first initiated.
- s. Submit total costs (both start-up and operating) for the entire period since the pilot test was first initiated.
- t. Submit total net income (loss) figures for the pilot test since the pilot test was first initiated.
- u. Give a precise citation in the current filing for every figure submitted in parts n. – t.
- v. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

**RESPONSE:**

This expanded response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to review the information previously provided in response to OCA/USPS-46, and provide additional information as necessary.

The Postal Service has already provided additional information in its June 28 response to OCA/USPS-145. That response provided detailed information on the Micropayments program. One could also perhaps suggest that the Postal Service's activities relating to Repositional Notes in the period before the filing of the request for a recommended decision for the Commission on that service might fall within the scope of this question. Since those activities were already discussed and examined in the context of that litigation, however, the Postal Service perceives no need to address them further in this context. Currently, there appear to be no pilot tests that might have implications for potential domestic retail postal services.

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OCA/USPS-47. Please list every pilot test of a potential domestic retail service, considered not of a type to be included in the Domestic Mail Classification Schedule, currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any pilot tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to pilot tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the pilot test.
- b. For each pilot test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each pilot test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the pilot test and describe the nature of their business.
- e. State the geographic scope of the pilot test.
- f. State the criteria for allowing certain companies, organizations, agencies, or individuals to participate, but not others.
- g. Have any companies, organizations, agencies, or individuals asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the pilot test? How are they affected?
- i. Is the pilot test activity considered a substitute for other mail products or services? Please explain.
- j. On what date was this pilot test initiated?
- k. Is this pilot test still being conducted? If not, when was the pilot test discontinued? State the reasons for discontinuing the pilot test.
- l. Provide a description of the primary intended users of the potential service.
- m. Provide a complete description of the activities performed by the Postal Service in conducting the pilot test.
- n. Submit each rate or fee, if any, charged under the pilot test.
- o. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each pilot test that has been terminated or discontinued.
- p. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the pilot test.
- q. Submit annual volume figures for each pilot test, if any, by billing

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- determinant.
- r. Submit annual net income (loss) figures, if any, for the pilot test since the pilot test was first initiated.
  - s. Submit total revenues for the pilot test, if any, for the entire period since the pilot test was first initiated.
  - t. Submit total costs (both start-up and operating) for the entire period since the pilot test was first initiated.
  - u. Submit total net income (loss) figures for the pilot test since the pilot test was first initiated.
  - v. Give a precise citation in the current filing for every figure submitted in parts o. – u.
  - w. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
  - x. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

**RESPONSE:**

This response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to provide additional information as necessary.

As noted in the Postal Service's objection, because the Postal Service can proceed with a nonpostal service without preparing and litigating a request for a recommended decision from the Commission, the period in which such a service is in pilot test phase or operations test phase is likely to be short. Once such a service begins to generate revenue, it would be handled like all other nonpostal services. Pertinent information about all such nonpostal services has now been provided (primarily in response to OCA/USPS-53). Currently, there appear to be no pilot tests or operations tests that might have implications for potential retail

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nonpostal services.

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OCA/USPS-48. Please list every operations test of a potential domestic postal retail service currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any operations tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such operations tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to operations tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the operations test.
- b. For each operations test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each operations test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the operations test and describe the nature of their business.
- e. State the geographic scope of the operations test.
- f. State the criteria for allowing certain mailers (or recipients) to participate, but not others.
- g. Have any mailers (or recipients) asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the operations test? How are they affected?
- i. On what date was this operations test initiated?
- j. Is this operations test still being conducted? If not, when was the operations test discontinued? State the reasons for discontinuing the operations test.
- k. Provide a description of the primary intended users of the potential service.
- l. Provide a complete description of the activities performed by the Postal Service in conducting the operations test.
- m. Submit each rate or fee, if any, charged under the operations test.
- n. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the operations test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each operations test that has been terminated or discontinued.
- o. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the operations test.
- p. Submit annual volume figures for each operations test, if any, by billing determinant.
- q. Submit net income (loss) figures, if any, for the operations test since the operations test was first initiated.

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- r. Submit total revenues for the operations test, if any, for the entire period since the operations test was first initiated.
- s. Submit total costs (both start-up and operating) for the entire period since the operations test was first initiated.
- t. Submit total net income (loss) figures for operations test since the operations test was first initiated.
- u. Give a precise citation in the current filing for every figure submitted in parts n. – t.
- v. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

**RESPONSE:**

This response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to provide additional information as necessary.

Responding to this question is complicated by the ambiguous nature of the concept of operations tests. There are a number of operations tests associated with on-going operations, and limited to a particular facility or a particular mailer. Such tests might include requests to evaluate barcode readability for a particular mailer, or the machinability of their mail pieces. These kinds of tests are quite decentralized, and information concerning them is generally confined to particular mailers or facilities. Perhaps more importantly, they relate to existing postal services, rather than potential new postal services. Currently, there appear to be no operations tests that might have implications for potential domestic retail postal services.

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OCA/USPS-49. Please list every operations test of a potential domestic retail service, considered not of a type to be included in the Domestic Mail Classification Schedule, currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any operations tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to operations tests that are nationwide, regional, or local in scope.

- a. Provide a detailed description of the operations test.
- b. For each operations test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
- c. For each operations test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
- d. State the number of participants in the operations test and describe the nature of their business.
- e. State the geographic scope of the operations test.
- f. State the criteria for allowing certain companies, organizations, agencies, or individuals to participate, but not others.
- g. Have any companies, organizations, agencies, or individuals asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
- h. What classes, and/or postal services or products, are potentially affected by the operations test? How are they affected?
- i. Is the operations test activity considered a substitute for other mail products or services? Please explain.
- j. On what date was this operations test initiated?
- k. Is this operations test still being conducted? If not, when was the operations test discontinued? State the reasons for discontinuing the operations test.
- l. Provide a description of the primary intended users of the potential service.
- m. Provide a complete description of the activities performed by the Postal Service in conducting the operations test.
- n. Submit each rate or fee, if any, charged under the operations test.
- o. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the operations test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each operations test that has been terminated or discontinued.
- p. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the operations test.

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- q. Submit annual volume figures for each operations test, if any, by billing determinant.
- r. Submit annual net income (loss) figures, if any, for the operations test since the operations test was first initiated.
- s. Submit total revenues for the operations test, if any, for the entire period since the operations test was first initiated.
- t. Submit total costs (both start-up and operating) for the entire period since the operations test was first initiated.
- u. Submit total net income (loss) figures for the operations test since the operations test was first initiated.
- v. Give a precise citation in the current filing for every figure submitted in parts o. – u.
- w. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
- x. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process. If the Postal Service does not make such an allocation, explain why not.

**RESPONSE:**

This response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to provide additional information as necessary.

As noted in the Postal Service's objection, because the Postal Service can proceed with a nonpostal service without preparing and litigating a request for a recommended decision from the Commission, the period in which such a service is in pilot test phase or operations test phase is likely to be short. Once such a service begins to generate revenue, it would be handled like all other nonpostal services. Pertinent information about all such nonpostal services has now been provided (primarily in response to OCA/USPS-53). Currently, there appear to be

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no pilot tests or operations tests that might have implications for potential retail nonpostal services.

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OCA/USPS-54. For nonpostal services with no associated window clerk activity (unnumbered paragraph 4), provide all calculations, worksheets, and primary sources for the total expense figure of \$7 million in FY04.

- a. Include all of the accounting expense data referred to in unnumbered paragraph 4.
- b. Display data separately for each discrete “nonpostal” service and show how they sum to the \$7 million total.
- c. Separately identify development costs for each “nonpostal” service and in total.
- d. Separately identify start-up costs for each “nonpostal” service and in total.
- e. Separately identify capital costs for each “nonpostal” service and in total.
- f. Separately identify common and joint costs for each “nonpostal” service and in total. Include all calculations, worksheets, and primary sources for the allocation of joint and common costs between DMCS and “nonpostal” services.
- g. Separately identify costs associated with each “nonpostal” service that has been terminated or discontinued and in total.
- h. For nonpostal services with no associated window clerk activity, provide all calculations, worksheets, and primary sources for the total revenue figure of \$44 million in FY04.
- i. Provide all comparable data requested in this interrogatory, including parts a. – i., for Fiscal Years 2001, 2002, 2003, and the most recent quarters of 2005.
- j. Provide test year estimates, i.e., FY2006, by discrete “nonpostal” service and in total, for expenses and revenues. Explicitly state all assumptions made in developing these estimates. Provide all calculations, worksheets, and primary sources used to develop the estimates.

### **RESPONSE:**

This response is filed pursuant to Presiding Officer’s Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to provide additional information regarding five of the nonpostal services with no associated window clerk activity.

Ruling No. 58 refers to a breakout of FY04 expenses into direct and indirect costs. The Postal Service does not explicitly classify expenses for these programs in such fashion, but somewhat similar categories of costs are

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presented below.

The first category is Operational (Oper). This includes expenses most directly associated with providing the product. As such, some of these costs may be volume variable.

The second category is Product Development (Prod Dev). These include expenses typically incurred during development of the product capability. None of the five services in question incurred any costs in this category during FY04.

The third category is Program Management/Other (ProgMang/Other). These include expenses such as program management and other expenses not identified within either of the first two categories. Some of these costs may be volume variable.

	<u>Oper</u>	<u>Prod Dev</u>	<u>ProgMang/Other</u>
Electronic Payment	0	0	15
Electronic Postmark	0	0	301
Mailing Online	810	0	96
NetPost Certified Mail	0	0	0
NetPost Cardstore	0	0	11

With respect to Electronic Payment, the marketing and operational responsibilities for the program were assumed by the alliance partner in 2002, and the program was terminated in April of 2004. With respect to EPM, the operation of EPM is performed by Authentidate, and therefore the Postal Service incurs no operational costs. With respect to Mailing Online, some of its

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operational costs could relate also to NetPost Certified Mail and NetPost Cardstore, which explains why no operational costs are shown for those two services. Additionally, NetPost Certified Mail was terminated in April, 2004.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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August 5, 2005