

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

Rate and Service Changes to Implement)
Baseline Negotiated Service Agreement)
with Bookspan)

Docket No. MC2005-3

OFFICE OF CONSUMER ADVOCATE INTERROGATORIES
TO UNITED STATES POSTAL SERVICE
(OCA/USPS-9-12)
September 6, 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 interrogatories OCA/USPS-T2-1-5 dated July 27, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-9. Please turn to the FY2002 data furnished in response to OCA/USPS-T2-17. Please also turn to the FY2002 data furnished in response to OCA/BOOKSPAN-T2-1; these data were furnished under seal. The yearly totals in the two responses are approximately equal, but there are substantial discrepancies for the monthly totals.

- (a) Please explain the discrepancies between the yearly totals.
- (b) Please explain the discrepancies between the monthly data from the two sources.

OCA/USPS-10. In the case of FY2003 data furnished under seal in response to OCA/BOOKSPAN-T2-1, the data furnished for October and the following September do not match the Postal Service data for October in Attachment 1, page 3 of Question 1, POIR No. 1. Please explain the discrepancy.

OCA/USPS-11. In the case of FY2004 data furnished under seal in response to OCA/BOOKSPAN-T2-1, the data furnished for October and the following September do not match the Postal Service data for October in Attachment 1, page 3 of Question 1, POIR No. 1. Please explain the discrepancy.

OCA/USPS-12. In the case of data furnished under seal in response to OCA/BOOKSPAN-T2-1 for FY2002, FY2003, and FY2004 there is a column of negative numbers denoted as "timing" prior to the October entry, and another column of positive numbers, also denoted as "timing" following the September entries.

- (a) Please explain the two columns and how these amounts should be spread among the various months; if your answers to the previous questions have provided this information, please so indicate.
- (b) If the amounts should not be spread among the various months, please explain the significance of the numbers and how they should be treated in an analysis.