

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

Repositionable Notes Minor Classification)  
Changes )

Docket No. MC2006-2

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS KIRK T. KANEER (OCA/USPS-T1-1-5)  
February 13, 2006

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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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 901 New York Ave Suite 200, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No.

C99-1). Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to the interrogatory, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-T1-1. Please refer to page 4 of your testimony, where you report by shape RPN pieces for First-Class and Standard Mail by month. Please confirm that the data contain *all* use of RPNs for the time period April-05 through November-05. If you do not confirm, please explain and provide data in a form consistent with Table 1 of page 4 of your testimony for all other RPN pieces mailed but not included in your testimony on page 4 and whether the RPN pieces, if any, were charged for the provision of RPN service.

OCA/USPS-T1-2. Please refer to the Direct Testimony of Darron K. Holland in Docket No. MC2004-5, USPS-T-1 at page 2, lines 6-11. The Postal Service conducted a one-year pilot test involving 4.2 million mailpieces ending in February 2003. In addition, the Postal Service began allowing RPNs on automation compatible letters in April 2003, with such mailings lasting at least until May of 2004. Finally, the Postal Service conducted a test of flat-sized mail in November 2003. This interrogatory seeks data for customers who participated in the pilot program.

- a. Please provide a table similar to Table 1 on page 4 of your testimony for all months prior to April of 2005 showing the quantities and postage, if any, on a monthly basis for RPN pieces by shape and class of mail, beginning with the one-year pilot test.
- b. Please provide data compatible with that provided in (a) for the set of customers for whom data are reported in (a) in terms of non-RPN pieces.

- c. Please provide in a form similar to Table 1 on page 4 of your testimony for all months from April of 2005 through November of 2005 the quantities of mail and postage, if any, on a monthly basis for RPN pieces by shape for those same customers who participated in the pilot RPN program.
- d. Please provide data compatible with that provided in (c) for the set of customers reported in (c) in terms of non-RPN pieces.

OCA/USPS-T1-3. This interrogatory seeks data for customers who did not participate in the pilot or other RPN mailings prior to April of 2005 but who began to use RPN in the time period after March of 2005. Associated with the data in Table 1 on page 4 of your testimony are a set of mailers. For mailers in this set who did not previously participate in any of the pilot program mailings prior to April-05, please provide the following data in a form similar to Table 1.

- a. A restatement of Table 1 for only these mailers.
- b. Data in a form compatible with Table 1 for mailings that are not RPN for the time period April-05 through November-05.
- c. Data in a form compatible with Table 1 for mailings that are not RPN for the time starting at the time that the initial pilot program commenced through April of 2005.

OCA/USPS-T1-4. Witness Holland reported in his testimony, Docket No. MC2004-5, USPS-T-1, page 2, lines 10-11 that “As a direct result of the response rates they received, three customers requested repeat mailings.”

- a. Please provide in a form similar to Table 1, page 4 of your testimony the monthly data of mailings and postage by shape for RPNs for the three customers in aggregate form, starting with the initial pilot test and running through all months to November-05.
- b. Please provide in a form similar to Table 1, page 4 of your testimony the monthly data of mailings and postage by shape for non RPN mailings for the three customers in aggregate form, starting with the initial pilot test and running through all months to November-05.

OCA/USPS-T1-5. This interrogatory seeks data for customers participating in pilot and/or other marketing tests related to the RPN program prior to April-05 and who did not engage in any mailings reported in Table 1 of your testimony. Please provide data on an aggregate basis in a form similar to Table 1, page 4 of your testimony for all customers participating in pilot and/or other marketing tests prior to April-05 who did not engage in any mailings reported in Table 1 of your testimony.

- a. Please provide separately both the RPN and non-RPN data prior to April of 2005.
- b. Please provide the non-RPN data for the time period of April 2005 through November of 2005.