

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

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF CONSUMER ADVOCATE
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
WITNESS ALTAH H. TAUFIQUE (OCA/USPS -T32-1-7)
June 2, 2006

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., N.W. Suite 200, 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 any of the interrogatories, 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-T32-1. Assume that the USPS had not proposed shape based rates in this docket. Please provide what the proposed Test Year After Rates rates would have been for the first ounce for each of the following:

- a. The First-Class Single Piece letter rate,
- b. The First-Class Single Piece Additional-ounce rate, and
- c. The First-Class Single Piece Nonmachinable surcharge.
- d. First-Class Automation Letters,
 - (i) Mixed AADC,
 - (ii) AADC,
 - (iii) 3-digit,
 - (iv) 5-digit and
 - (v) The Additional ounce rate.
- e. First-Class Automation Flats,
 - (i) Mixed AADC,
 - (ii) AADC,
 - (iii) 3-digit,
 - (iv) 5-digit,
 - (v) Additional ounce rate, and
 - (vi) The Nonmachinable surcharge.

OCA/USPS-T32-2. Please provide the proposed Test Year After Rate unit costs for the following rate categories of First-Class Mail. Include in your response to the

following interrogatory, the derivation of all calculated values, cite all sources, and provide copies of those source documents not previously filed.

- a. The First-Class Single Piece first-ounce letter,
- b. The First-Class Single Piece first-ounce flat,
- c. The First-Class Single Piece first-ounce parcel,
- d. The First-Class Automation Letter first-ounce cost for,
 - (i) Mixed AADC,
 - (ii) AADC,
 - (iii) 3-digit, and
 - (iv) 5-digit,
- e. The First-Class Automation Letter Additional ounce cost,
- f. The First-Class Automation Flat first-ounce cost for,
 - (i) Mixed AADC,
 - (ii) AADC,
 - (iii) 3-digit, and
 - (iv) 5-digit.
- g. The First-Class Automation Flat Additional ounce cost.

OCA/USPS-T32-3. Please provide ball park estimates of the annual postage that an average, or typical, household would likely pay using: (1) the USPS proposed Test Year Rates and (2) the USPS Test Year Rates under the former non-shaped based structure. Include in your response the derivation of all calculated values, cite all

sources, and provide copies of those source documents not previously filed in this docket.

OCA/USPS-T32-4. Please explain why you recommend passing through 50 percent of the cost differential between First Class Single-Piece first-ounce letter and First-Class Single Piece first-ounce flats as opposed to a lower (or higher) percentage pass through.

OCA/USPS-T32-5. For FY 2005, what percentage of single piece Priority Mail postage was paid by a customer at the window? If you are unable to provide an exact percentage, please provide a ball park estimate. Include in your response the derivation of all calculated values, cite all sources, and provide copies of those source documents not previously filed in this docket.

OCA/USPS-T32-6. For FY 2005, what percentage of single piece Priority Mail postage is prepaid by the customer prior to dropping off the parcel at the USPS window? If you are unable to provide an exact percentage, please provide a ball park estimate. Include in your response the derivation of all calculated values, cite all sources, and provide copies of those source documents not previously filed in this docket.

OCA/USPS-T32-7. The following interrogatory relates to the proposed Priority Mail “Dim-weighting” pricing and the introduction of the one cubic foot maximum dimension restriction for Zones 5 through 8.

- a. Given that many shapes can fall within the one foot cubic maximum dimension, please specifically identify each step that a window clerk must perform to determine the postage for a Priority Mail package to Zones 5 through 8 that may exceed the one cubic foot package volume restriction.
- b. Referring to part a of this interrogatory, please specifically identify whether and how the additional steps taken by the window clerk, to ensure that a Priority Mail package does not exceed the one cubic foot volume, are factored into the cost calculations for window clerk time either for Dim-weight pricing or for window clerk time not attributed to Dim-weight pricing. Include in your response the derivation of all calculated values, cite all sources, and provide copies of those source documents not previously filed in this docket.