

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

Rate and Service Changes to Implement )  
Baseline Negotiated Service Agreement ) Docket No. MC2006-3  
With Washington Mutual Bank )

OFFICE OF CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ALI AYUB (OCA/USPS-T1-32-33)  
(July 11, 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. Instructions included with OCA interrogatories OCA/USPS-T1-1-5 are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T1-32. This interrogatory seeks information on the price elasticity for Washington Mutual Bank (WMB). Please refer to your testimony at page 17-24, "C. USPS Analysis of WMB Before Rates Forecast," and the Request, Attachment F, which reproduces the original Negotiated Service Agreement Between United States Postal Service and Washington Mutual Bank (herein "original NSA").

- a. At any point prior to the signing of the original NSA on March 16, 2006, did the Postal Service request from WMB an estimate of WMB's own-price elasticity of demand for First-Class acquisition, billing, or customer communications mail, or a weighted-average thereof? Please explain.
- b. At any point prior to the signing of the original NSA on March 16, 2006, did the WMB provide an estimate of WMB's own-price elasticity of demand for First-Class acquisition, billing, or customer communications mail, or a weighted-average thereof? Please explain. If yes, provide the own-price elasticity of demand.
- c. At any point prior to the signing of the original NSA on March 16, 2006, did the Postal Service estimate an own-price elasticity of demand for WMB's First-Class acquisition, billing, or customer communications mail, or a weighted-average thereof? Please explain. If yes, provide the own-price elasticity of demand.

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reproduces the original Negotiated Service Agreement Between United States Postal Service and Washington Mutual Bank (herein "original NSA").

- a. At any point prior to the signing of the original NSA on March 16, 2006, did the Postal Service request from WMB an estimate of WMB's cross-price elasticity of demand for Standard Mail with respect to a change in price of First-Class Mail? Please explain.
- b. At any point prior to the signing of the original NSA on March 16, 2006, did the WMB provide an estimate of WMB's cross-price elasticity of demand for Standard Mail with respect to a change in price of First-Class Mail? Please explain. If yes, provide the cross-price elasticity of demand.
- c. At any point prior to the signing of the original NSA on March 16, 2006, did the Postal Service estimate WMB's cross-price elasticity of demand for Standard Mail with respect to a change in price of First-Class Mail? Please explain. If yes, provide the cross-price elasticity of demand.