

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

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DREW MITCHUM (OCA/USPS-T40-61-63)
(July 12, 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. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T40-61. This interrogatory seeks information on Confirm service volumes.

- a. Please confirm that the number of First-Class and Other mailpieces for Destination and Origin services, and the number of such mailpieces that have PLANET Codes, is contained in the Confirm service preshipment notifications (i.e., EMD files). If you do not confirm, please explain.
- b. For Fiscal Years 2003, 2004, and 2005, from information available in the Confirm service preshipment notifications (i.e., EMD files), please provide a table showing the following: The total number of First-Class and Other mailpieces for Destination and Origin services, and the percent of such mailpieces that have PLANET Codes. If the requested information is not available for all three fiscal years, please provide the requested information for the most recent fiscal year or other period.

OCA/USPS-T40-62. This interrogatory seeks information on the relationship of Confirm service to other Postal Service mail programs.

- a. Please confirm that OneCode Address Change Service (ACS), OneCode Confirm, and other future mail service programs, such as "Surface Visibility" and "Seamless Acceptance," will utilize the same data scanning and storage systems insofar as they rely on mailpiece-level observations. If you do not confirm, please explain.
- b. Please confirm that the data scanning and storage system used for OneCode Address Change Service (ACS), and OneCode Confirm, and other future mail service programs, such as "Surface Visibility" and "Seamless Acceptance," will be the same data scanning and storage system used by Confirm subscribers

insofar as they rely on mailpiece-level observations. If you do not confirm, please explain.

OCA/USPS-T40-63. This interrogatory seeks information on scan data from Confirm service.

- a. Please confirm that at the present time Confirm subscribers may obtain from the Postal Service, at the subscriber's option, scan data consisting of the first scan, the last scan, or all scans from a mailpiece. If you do confirm, do Silver and Gold subscribers pay only for the additional scans obtained? If you do not confirm, please explain.
- b. If you do confirm part a, above, will this option remain available to Confirm subscribers under your pricing and classification proposal for Confirm service? If the option will remain available, will Silver and Gold subscribers pay only for the additional scans obtained? Please explain.
- c. Assume two mailpieces displaying identical PLANET Codes included in the same preshipment notification (i.e., EMD file) for the same subscriber. Both mailpieces are addressed to the same delivery point, and each mailpiece receives three scans. Does Confirm service identify two separate mailpieces with three scans each, or one mailpiece with six scans? Please explain.
- d. Assume a mailpiece displaying a PLANET Code is forwarded to a new address, after being transported to the delivery unit servicing the former (i.e., old) address. Based upon the number of scans for that mailpiece, does Confirm service identify one mailpiece or does it identify two separate mailpieces? Please explain.