

UNITED STATES OF AMERICA
Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Rate and Service Changes to Implement)
Functionally Equivalent Negotiated)
Service Agreement with Bradford Group)

Docket No. MC2007-4

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORY
TO THE BRADFORD GROUP WITNESS
WENDY RING (OCA/BG-T2-1)
(August 24, 2007)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-4, dated August 10, 2007, are hereby incorporated by reference

Respectfully submitted,

Kenneth E. Richardson, Acting Director
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OCA/BG-T2-1. Please refer to your testimony at page 8, lines 2-5, where it states:

While the Postal Service may project its future mail volumes based on its historic experience, THE BRADFORD GROUP cannot forecast total numbers of mailpieces independently from its planning of other direct market campaigns. Its decision with respect to the operation of its campaigns dictates that it cannot offer a mail volume forecast with great precision more than a few months in advance.

- a. Please identify and describe the “other direct marketing campaigns” used by the Bradford Group.
- b. Please identify and explain possible factors and events that might affect the “planning of other direct marketing campaigns.”
- c. Please explain how the “other direct marketing campaigns” might affect the “forecast total numbers of mailpieces.”
- d. Given the operation of its campaigns, please explain why the Bradford Group cannot “forecast with great precision more than a few months in advance.”