

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 INTERROGATORIES
TO UNITED STATES POSTAL SERVICE
WITNESS BRODERICK A. PARR
(OCA/USPS-T1-27-28)
(September 7, 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 interrogatories and requests 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,

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OCA/USPS-T1-27. Please refer to your testimony, Appendix A, page 4, which presents the Bradford Group's Standard Mail Regular Letter Unit Cost in column (1), entitled "TYAR 2008 Total Unit Cost (Dollars)." Also, please refer to Note (1), which references the sources used to develop the unit costs for Regular letters in column (1).

- a. Please confirm that you relied on PRC-LR-22, Docket No. R2006-1, as the basis for developing the "TYAR 2008 Total Unit Cost[s]" for the Bradford Group's Standard Mail Regular letters. If you do not confirm, please explain.
- b. In Docket No. R2006-1, please confirm that the Commission relied on PRC-LR-15, which contains the calculation of the Commission's recommended rates for Standard Mail Regular and ECR letters and flats, as the basis for the Standard Mail Regular letters rate design, and that PRC-LR-15 identified total unit costs for Standard Mail Regular letters. If you do not confirm, please explain.
- c. Please provide a detailed explanation of why you used PRC-LR-22 rather than PRC-LR-15 as the basis for developing the "TYAR 2008 Total Unit Cost[s]" for the Bradford Group's Standard Mail Regular letters. In your explanation, please identify any differences between PRC-LR-22 and PRC-LR-15, and explain how your use of PRC-LR-22 rather than PRC-LR-15 affected the development of the "TYAR 2008 Total Unit Cost[s]" for the Bradford Group's Standard Mail Regular letters.

OCA/USPS-T1-28. Please refer to your testimony, Appendix A, page 6, which presents the Bradford Group's Standard Mail Regular and ECR flats unit costs in columns (1) and (5), both entitled "TYAR 2008 Total Unit Cost (Dollars)." Also, please refer to Note (1),

which references the sources used to develop the unit costs for Regular and ECR flats in columns (1) and (5), respectively.

- a. Please confirm that you relied on PRC-LR-22, Docket No. R2006-1, as the basis for developing the “TYAR 2008 Total Unit Cost[s]” for the Bradford Group’s Standard Mail Regular and ECR flats. If you do not confirm, please explain.
- b. In Docket No. R2006-1, please confirm that the Commission relied on PRC-LR-15, which contains the calculation of the Commission's recommended rates for Standard Mail Regular and ECR letters and flats, as the basis for the Standard Mail Regular and ECR flats rate design, and that PRC-LR-15 identified total unit costs for Standard Mail Regular and ECR flats. If you do not confirm, please explain.
- c. Please provide a detailed explanation of why you used PRC-LR-22 rather than PRC-LR-15 as the basis for developing the “TYAR 2008 Total Unit Cost[s]” for the Bradford Group’s Standard Mail Regular and ECR flats. In your explanation, please identify any differences between PRC-LR-22 and PRC-LR-15, and explain how your use of PRC-LR-22 rather than PRC-LR-15 affected the development of the “TYAR 2008 Total Unit Cost[s]” for the Bradford Group’s Standard Mail Regular and ECR flats.