

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO COMMISSION INFORMATION REQUEST NO. 1, QUESTIONS 1 AND 3
(September 28, 2007)

The United States Postal Service hereby provides the responses to Commission Information Request (CIR) No. 1, Questions 1 and 3, which was issued September 14, 2007. Postal Service witness Parr (USPS-T1-1) is sponsoring these responses. Each question is stated verbatim and is followed by the response. The Bradford Group will provide responses to CIR No. 1, Questions 4-5.

The Postal Service response to CIR No. 1, Question 2, will be forthcoming. Question 2 requests data contained in workpapers that the OCA has requested in interrogatories OCA/USPS-T1-19(c), 20, 21(c), 21(f), and 22, for which a Joint Motion for Protective Conditions has been filed. The Postal Service and Bradford Group are willing to provide this data subject to protective conditions, and expect to file a response to CIR No. 1, Question 2 shortly.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3179, Fax -6187
September 28, 2007

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO COMMISSION INFORMATION REQUEST NO. 1, QUESTION 1

1. In USPS-T-1 at page 2, witness Parr defines solicitation mail as “letters and flats sent as Standard Mail...seeking customers for collectibles and gift items.” Does The Bradford Group use letters and flats sent as First-Class Mail to solicit customers? If so, how much of this mail will convert to Standard Mail as a result of this NSA?

RESPONSE:

No. The use of First-Class Mail occurs through invoicing and correspondence.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO COMMISSION INFORMATION REQUEST NO. 1, QUESTION 3

3. In USPS-T-1, page 9, Figure 1, witness Parr cites a graph showing that warehouse clubs and superstores have become major competitors to catalogers and other nonstore retailers. Are the figures represented in this graph solely applicable to the collectibles market in which The Bradford Group competes, or do they represent all merchandise sold by both warehouse clubs and superstores and by nonstore retailers?

RESPONSE:

The figures represent all merchandise sold by both warehouse clubs and superstores and by nonstore retailers as a proxy for the collectibles market product offering in both retail groupings. Merchandise sold by warehouse clubs and superstores includes merchandise also sold in the collectibles industry.