

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE
COMMISSION

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: BETH B. ROTHSCHILD (OCA/USPS-T4-30-31)
(August 5, 1998)

Pursuant to sections 25 and 26 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-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

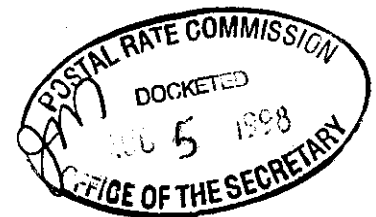
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

Shelley S. Dreifuss
Attorney



OCA/USPS-T4-30. The following interrogatory refers to section I of USPS-LR-2/MC98-

1. Record 2 of the "Control File" states, "Minimum weight cutoff (can be negative)."

Please explain the rationale for having a negative minimum weight cutoff. Include in your explanation examples of instances where a negative minimum weight cutoff is appropriate.

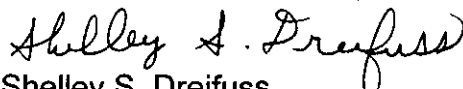
OCA/USPS-T4-31. Section E of USPS-LR-2/MC98-1 contains version 1 and version 3-5 of questionnaires dated January 1997.

- a. Please provide a copy of version 2 of the questionnaire dated January 1997.
- b. Please explain the purpose of the different versions of the questionnaire dated January 1997.
- c. There are 6 pages after page 19 of the "version 5" questionnaire. Two of the 6 are marked "3" on the bottom, 2 are marked "5" on the bottom, and 2 are unnumbered but are titled "NETPOST SERVICE." One page 5 has a note that appears to indicate it has the 25% contribution margin prices, the other page 5 appears to indicate it has the 50% contribution margin prices.
 - (1) Please confirm that the interpretation of "25%Cont." as 25 percent contribution margin is correct. If you are unable to confirm, please explain.
 - (2) Please confirm that the interpretation of "50%Cont." as 50 percent contribution margin is correct. If you are unable to confirm, please explain.

- (3) Please explain the purpose of including the 2 seemingly identical page number 3s. If they are not identical, please identify the difference(s).
 - (4) Please explain the purpose of including the 2 seemingly identical unnumbered pages titled "NETPOST SERVICE." If they are not identical, please identify the difference.
- d. Page 5 of the version 5 questionnaire indicates that a separate "five-page brochure that describes NETPOST and its prices" was provided. Please provide a copy of that brochure.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
August 5, 1998