

ORIGINAL

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

RECEIVED
OCT 28 11 50 AM '98
POL. SEC. DIV.
OFF. OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: MICHAEL K. PLUNKETT
(OCA/USPS-T5-35-37)
(October 28, 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

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T5-35. Please refer to your response to OCA/USPS-T1-46(d) (redirected from witness Garvey) and to your Exhibit USPS-5D (USPS-T-5, page 30). In your interrogatory response you state, “[I]f document length is a parameter used to define potential batch types, some are highly unlikely to be chosen at all.”

- a. Please confirm that your Exhibit 5D shows 16,444,(000) 8.5x11 pieces of year-one MOL consisting of more than 15 pages. If you do not confirm, please state what the number 16,444 in your exhibit represents.
- b. Please confirm that your Exhibit 5D allocates 31 percent of the 16,444,(000) pieces, or 5,103,(000) pieces, to First Class flats. If you do not confirm, please show the correct allocation and explain its basis. If you do confirm, please explain the basis for your allocation.
- c. Please confirm that your Exhibit 5D allocates 33.3 percent of the 5,103,(000) pieces, or 1,699,(000) pieces, respectively to the four-ounce, five-ounce, and six-ounce weight increments of First Class flats. If you do not confirm, please show the correct allocation and explain its basis. If you do confirm, please explain the basis for your allocation.
- d. Please confirm that a 29-page, 8.5x11 flat with envelope would weigh 6.2 ounces. If you do not confirm, please provide the correct weight and show its derivation.
- e. Please confirm that your Exhibit 5D assumes that there will be no year-one, First-Class, 8.5x11 MOL pieces in excess of 28 pages. If you do not confirm, please show where such pieces appear in your exhibit and explain the basis for your allocation. If you do confirm, please explain the basis for your assumption.

- f. Please list all subclass/job-type/page-count categories for which you have assumed zero year-one volume and explain the basis for your assumption.
- g. Please provide an allocation of year-one MOL volume across subclass/print-site/job-type/page-count categories that is consistent with your Exhibit 5D. If more than one such allocation exists, please provide the best one and explain why your choice is best.
- h. Please confirm that you have implicitly assumed that the likelihood of particular job-type/page-count batches declines with page count. If you do not confirm, please explain why you have assumed zero year-one volumes for certain high-page-count batches.
- i. Do you agree that it is reasonable to assume that the likelihood of particular job-type/page-count batches declines with page count. If you do not agree, please provide a more plausible assumption and justify it.
- j. Please confirm that one-page documents are more likely than any other MOL documents. If you do not confirm, please identify all page counts that are more likely and explain the basis for your response.

OCA/USPS-T5-36. Please provide, and show the derivation of, a total year-one nonpostage revenue for MOL based on current printer contract prices.

OCA/USPS-T5-37. Please provide, in hard copy and stand-alone electronic form (see USPS-LR-8/MC98-1), a version of your Exhibit 5B (USPS-T-5, pages 25-26) based on

current contract printer prices and corrected information systems costs (see OCA/USPS-T3-77).

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.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
October 28, 1998