

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Experimental "Ride-Along")
Classification Change for Periodicals)

Docket No. MC2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: ALTAF H. TAUFIQUE (OCA/USPS-T1-1-8)
(October 18, 1999)

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.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log, as required in Presiding Officer's Rulings C99-1/9 and 11. Specifically, "the party shall

make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection." F.R.C.P. 26(b)(5).

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,



TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

OCA/USPS-T1-1. Please refer to the testimony at page 2, lines 21-23.

- a. For Standard (A) mail currently enclosed with or attached to Periodical publications, please explain whether the “additional costs, if any,” associated with such Standard (A) enclosures or attachments are distance-related transportation costs, non-distance-related transportation costs or non-transportation costs.
- b. Please provide an estimate of the amount of “additional costs, if any,” associated with Standard (A) enclosures or attachments to Periodical publications for the costs identified in part a. of this interrogatory.
- c. For Standard (A) mail currently enclosed with or attached to Periodical publications, please identify and provide an estimate of the amount of “additional costs, if any,” associated with such Standard (A) enclosures or attachments to Periodical publications not identified in part a. of this interrogatory.

OCA/USPS-T1-2. Please refer to Exhibit I, and the table entitled “Standard (A) Attachments and Enclosures with Periodicals.”

- a. Please confirm that the figures 1,451,574, and 2,903,148, represent “WEIGHT” in pounds. If you do not confirm, please explain.
- b. Please provide a copy of all data from the FY98 Centralized Postage Payment System (CPP) concerning Standard (A) enclosures or attachments with Periodicals mail.
- c. Please provide a copy of all supporting documentation explaining the CPP as it relates to determining the volume and revenues of Standard (A) enclosures or attachments with Periodicals mail.

OCA/USPS-T1-3. Please refer to the testimony at page 4, lines 19-22, where it states, "As long as the shape and automation compatibility of the host piece is not affected by the inclusion of the 'Ride-Along' piece, then, presumably, any additional costs would be caused only by the additional weight of the 'Ride-Along' piece." Also please refer to Exhibit I. At an average weight of 1.8 ounces, the 77,142,000 additional pieces would weigh a total of 8,679,150 pounds $((77,148,000 * 1.8) / 16\text{oz.})$. Similarly, at an average weight of 3.3 ounces, the 77,142,000 additional pieces would weigh a total of 15,911,775 pounds $((77,148,000 * 3.3) / 16\text{oz.})$.

- a. Will 77,142,000 additional pieces, if they were to weigh a total of 8,679,150 pounds, incur additional distance-related transportation costs, non-distance-related transportation costs or non-transportation costs? Please estimate the additional costs for each type of cost.
- b. Will 77,142,000 additional pieces, if they were to weigh a total of 15,911,775 pounds, incur additional distance-related transportation costs, non-distance-related transportation costs or non-transportation costs? Please estimate the additional costs for each type of cost.

OCA/USPS-T1-4. Please refer to the testimony at page 8, lines 22-23, and page 9, lines 1-4. Assuming there are no additional mail processing or delivery costs, would the entire estimated \$10.2 million in revenues resulting from the "Ride-Along" classification change be a contribution to the institutional costs of Periodicals Mail? Please explain the answer in detail.

OCA/USPS-T1-5. Please refer to the testimony at page 7, lines 18-21. Please explain the basis for the “conservative” assumption that only 50 percent of the Standard (A) mail pieces are currently reported through the CPP.

OCA/USPS-T1-6. Please refer to the testimony at page 19, lines 7-9.

- a. Please explain in detail the nature of the “evaluation” to be performed on the “Ride-Along” pieces to “ensure that additional mail processing and delivery costs are not being incurred due to the inclusion of the ‘Ride-Along’ attachment.”
- b. To the extent that there are additional costs associated with the “Ride-Along” pieces, please state how the “Data Collection Plan” will measure or estimate, and report, such additional costs. Please explain the answer in detail.

OCA/USPS-T1-7. Please refer to the testimony at page 18, lines 12-20.

- a. Will all mailers of a Periodicals mailing be required to report the number of “Ride-Along” pieces, the number of pieces by weight (including the weight of pieces where there may be different weights of “Ride-Along” pieces in a mailing), and revenue associated with the “Ride-Along” pieces in each Periodicals mailing? If not, please explain why this information need not be reported.
- b. Will all mailers of Periodicals mailings be required to report the number of periodical pieces, and the weight and revenue of the periodicals pieces associated with the “Ride-Along” pieces? If not, please explain why this information need not be reported.

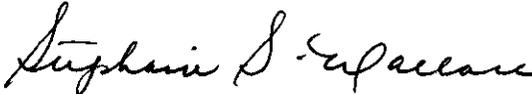
- c. Does the Postal Service intend to collect data on the zones to which the "Ride-Along" pieces will be mailed? If not, please explain why not.
- d. For the duration of the experiment, will the data identified in parts a., b. and c. of this interrogatory be reported to the Commission immediately following the close of each Accounting Period during the experiment? If not, please explain why not.

OCA/USPS-T1-8. Please refer to the testimony at page 18, lines 13-16.

- a. Please explain in what ways the planned "alternate version of Form 3541" will differ from Form 3541. Please provide a copy of Form 3541 and the "alternate version of Form 3541."
- b. Please explain whether the "alternate version of Form 3541" is to be used by all mailers of "Ride-Along" mailings in lieu of, or in addition to, Form 3541.
- c. Will the "alternate version of Form 3541" collect data on the number of "Ride-Along" pieces, the number of pieces by weight (including the weight of pieces where there may be different weights of "Ride-Along" pieces in a mailing), and revenue associated with the "Ride-Along" pieces in each Periodicals mailing? If not, please explain how such information will be obtained.

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.


STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
October 18, 1999