

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

Postal Rate and Fee Changes, 2005 )

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TOUNITED STATES POSTAL SERVICE  
WITNESS ALTAF H. TAUFIQUE  
(OCA/USPS-T28-1-4)  
(April 19, 2005)

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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T28-1. Please refer to your testimony, Tables 11 and 12, the “Summary of Revenues” for the test year before rates and after rates, respectively. Please provide the “Summary of Revenues” for Fiscal Years 2004 and 2005 in the same manner as the test year before rates and after rates “Summary of Revenues” shown in Exhibit USPS-28A, Tables 11 and 12.

OCA/USPS-T28-2. Please refer to LR-K-115, USPST28Aspreadsheets.xls, worksheet “FCM-9 Cap One,” showing the Capital One volume and average discount.

- a. For Fiscal Years 2005, 2006, 2007, and 2008, please show the derivation of the Capital One’s volume estimate. Provide citations to all figures used, and explain all assumptions.
- b. Please explain the purpose and use of estimates for Capital One’s volumes for Fiscal Years 2007 and 2008 in this proceeding.
- c. Please confirm that Capital One’s estimated annual volume on which discounts were paid in FY2004 was 63,862,895 ( $69,184,803 / 13 * 12$ ). See Docket No. MC2002-2, Data Collection Report, January 31, 2005, at Appendix A: page 1. If you do not confirm, please explain.

OCA/USPS-T28-3. Please refer to LR-K-115, USPST28Aspreadsheets.xls, worksheet “FCM-6 Discover AR,” and the line “Revenue Lost.”

- a. Please confirm that the amount of “Revenue Lost” for FY 2005 should be \$1,711,125. If you do not confirm, please explain.
- b. Please explain the purpose and use of estimates for Discover’s volumes and incremental revenue for Fiscal Years 2007 and 2008 in this proceeding.

OCA/USPS-T28-4. Please refer to LR-K-115, USPST28Aspreadsheets.xls, worksheet "FCM-8 Bank One AR," and the line "Revenue Lost (Standard Mail)."

- a. Please confirm that the amount of "Revenue Lost (Standard Mail)" for FY 2005 should be \$1,686,368. If you do not confirm, please explain.
- b. Please explain the purpose and use of estimates for Bank One's volumes and incremental revenue for Fiscal Years 2007 and 2008 in this proceeding.