

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH BOOKSPAN

Docket No. MC2005-3

**COMPELLED RESPONSE OF POSTAL SERVICE WITNESS YORGEY
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T2-11c.-e.)**

The United States Postal Service hereby provides the compelled response of witness Yorgey to interrogatory OCA/USPS-T2-11c.-e., pursuant to Presiding Officer's Ruling No. MC2005-3/6, issued on September 13, 2005.

The relevant parts of the interrogatory are stated verbatim and are followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 20, 2005

COMPELLED RESPONSE OF POSTAL SERVICE WITNESS YORGEY
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T2-11. Please refer to your testimony at page ii. You state that: "In 1996, I was selected as the Program Manager for International Customized Mail agreements in the newly formed International Business Unit. I was responsible for negotiation, development and implementation of ICM agreements."

- c. Please state the number of ICM agreements, by year, that the Postal Service entered into during the period of time given in answer to part b. of this interrogatory. Please break down this number into:
 - i. number, or percentage, of total ICM agreements (by year) that broke even, i.e., revenues equaled costs.
 - ii. number, or percentage, of total ICM agreements (by year) that produced a surplus, i.e., revenues exceeded costs.
 - iii. number, or percentage, of total ICM agreements (by year) that lost money, i.e., costs exceeded revenues.
- d. Please list all measures used by the Postal Service to ensure revenue surpluses for ICM agreements.
 - i. How successful were these measures?
 - ii. If the measures were not entirely successful, what changes to these measures are being taken with respect to ICM agreements.
- e. Please describe in detail all methods and techniques that were used under your direction to estimate the volumes that would be entered by mailers pursuant to ICM agreements.
 - i. How accurate were the volume estimation methods and techniques that were used?
 - ii. If the measures were not entirely successful, what changes to these methods and techniques were adopted to make them more successful?

RESPONSE:

- c.-e. My understanding is that data concerning international revenues and costs are not provided publicly by the Postal Service, but are made available for the Commission under seal.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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