

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JAMES W. PAGE (OCA/USPS-T23-1-4)
(June 2, 2006)

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 interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T23-1. Please confirm that on Table 14C of your testimony, the volume variable cost should be \$482,000 rather than \$482, and total incremental costs should be \$1,189,000 rather than \$1,189. If you do not confirm, please explain.

OCA/USPS-T23-2. This interrogatory seeks to clarify the number of Confirm subscribers estimated for the test year after rates. Please refer to Table 14C of your testimony. Please reconcile your test year after rates total number of subscribers of 200 with the test year after rates total number of subscribers of 180 estimated by witness Drew Mitchum (USPS-T-40), as shown in LR-L-124, spreadsheet tab "WP-4 Confirm."

OCA/USPS-T23-3. This interrogatory seeks information about the number of scans for Confirm service. Please refer to LR-L-59, and the Excel file "Confirm.xls."

- a. Please provide the total number of scans actually provided to the 16 subscribers of the "Silver" subscription service in the base year, FY 2005.
- b. Please provide the cost per scan (or cost per one million scans) for the 16 subscribers of the "Silver" subscription service in the base year, FY 2005.
Please show all calculations.
- c. Please provide the total number of scans actually provided to the 119 subscribers of the "Gold" subscription service in the base year, FY 2005.
- d. Please provide the cost per scan (or cost per one million scans) for the 119 subscribers of the "Gold" subscription service in the base year, FY 2005. Please show all calculations.
- e. Please provide the total number of scans actually provided to the 45 subscribers of the "Platinum" subscription service in the base year, FY 2005.

- f. Please provide the cost per scan (or cost per one million scans) for the 45 subscribers of the "Platinum" subscription service in the base year, FY 2005. Please show all calculations.
- g. Please provide the total estimated number of scans for each block of one million units to be provided to Confirm subscribers in the test year after rates.
- h. Please provide the cost per scan (or cost per one million scans) for scans purchased in blocks for Confirm subscribers in the test year after rates. Please show all calculations.

OCA/USPS-T23-4. This interrogatory seeks information about the development of costs for Confirm service. Please refer to LR-L-59, and the Excel file "Confirm.xls."

- a. Please show the development of the cost figures in column FY 2006 (the base year), and explain the relationship between the cost figures in column FY 2006 and the cost figures in the "ACTUAL COST" columns, FY 1999 to FY 2005.
- b. Please show the development of the cost figures in column FY 2007, and explain the relationship between the cost figures in column FY 2007 and the cost figures in column FY 2006.
- c. Please show the development of the cost figures in column FY 2008 (the test year after rates), and explain the relationship between the cost figures in column FY 2008 (the test year after rates) and the cost figures in columns FY 2006 and FY 2007.