

UNITED STATES OF AMERICA  
Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Rate and Service Changes To Implement)  
Baseline Negotiated Service Agreement )  
With Life Line Screening )

Docket No. MC2007-5

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES  
TO UNITED STATES POSTAL SERVICE  
WITNESS MICHELLE K. YORGEY  
(OCA/USPS-T1-1-4)  
(September 7, 2007)

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/LLS-T1-1-11, dated August 27, 2007, are hereby incorporated by reference.

Respectfully submitted,

Kenneth E. Richardson, Acting Director  
Office of the Consumer Advocate

Emmett Rand Costich, Attorney

901 New York Avenue, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6833; Fax (202) 789-6891  
e-mail: [costicher@prc.gov](mailto:costicher@prc.gov)

OCA/USPS-T1-1. Please refer to your testimony, Appendix A, page 3, which presents Life Line Screening's Standard Mail Regular and ECR letter unit revenue in column (1), entitled "Revenue per piece." Please provide electronic workpapers showing the development of the "Revenue per piece" figures for letters shown in column (1). Also, please provide citations to all figures used.

OCA/USPS-T1-2. Please refer to your testimony, Appendix A, page 3, which presents the volumes for Life Line Screening's Standard Mail Regular and ECR letters in column (2), entitled "Volume." Please provide electronic workpapers showing the development of the "Volume" figures for letters shown in column (2). Also, please provide citations to all figures used.

OCA/USPS-T1-3. Please refer to your testimony, Appendix A, page 4, which presents Life Line Screening's Standard Mail Regular and ECR letter unit costs in the column (1), entitled "TYAR 2008 Total Unit Cost (Dollars)." Please provide electronic workpapers showing the development of the "TYAR 2008 Total Unit Cost" figures for Standard Mail Regular and ECR letters shown in column (1). Also, please provide citations to all figures used.

OCA/USPS-T1-4. Please refer to your testimony, Appendix A, page 4, which presents Life Line Screening's Standard Mail Regular and ECR letter unit costs in column (1),

entitled "TYAR 2008 Total Unit Cost (Dollars)." Also, please refer to Note (1), which references the sources used to develop the unit costs for Regular letters in column (1).

- a. Please confirm that you relied on PRC-LR-22, Docket No. R2006-1, as the basis for developing the "TYAR 2008 Total Unit Cost[s]" for Life Line Screening's Standard Mail Regular and ECR letters. If you do not confirm, please explain.
- b. In Docket No. R2006-1, please confirm that the Commission relied on PRC-LR-15, which contains the calculation of the Commission's recommended rates for Standard Mail Regular and ECR letters and flats, as the basis for the Standard Mail Regular and ECR letters rate design, and that PRC-LR-15 identified total unit costs for Standard Mail Regular and ECR letters. If you do not confirm, please explain.
- c. Please provide a detailed explanation of why you used PRC-LR-22 rather than PRC-LR-15 as the basis for developing the "TYAR 2008 Total Unit Cost[s]" for Life Line Screening's Standard Mail Regular and ECR letters. In your explanation, please identify any differences between PRC-LR-22 and PRC-LR-15, and explain how your use of PRC-LR-22 rather than PRC-LR-15 affected the development of the "TYAR 2008 Total Unit Cost[s]" for Life Line Screening's Standard Mail Regular and ECR letters.