

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BRADFORD GROUP

Docket No. MC2007-4

RESPONSES OF POSTAL SERVICE WITNESS PARR
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-15-16)
(September 12, 2007)

The United States Postal Service hereby provides the responses of witness Parr to the following interrogatories of the Office of the Consumer Advocate, filed on August 29, 2007: OCA/USPS-T1-15-16.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 12, 2007

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T1-15. Please refer to your response to OCA/USPS-T1-1, where it states, “The downward pressure on letter volume is only expected to continue in the absence of an incentive to increase letter volume.” Please confirm you are assuming that the NSA’s discounted rates will be solely responsible for any increase in the Bradford Group’s letter volumes that exceed the before-rates letter volume forecast. If you do not confirm, please explain.

RESPONSE:

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PARR
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OCA/USPS-T1-16. Please consider the following statement:

Once discounts intended to influence mailer behavior are established, it is not possible to 'observe' what mailer behavior would have been without such discounts.

Docket No. MC2002-2, Tr. 4/767 (Response of Witness Plunkett to POIR No. 2, Question 5).

- a. Please confirm that this statement is still accurate. If you do not confirm, please explain.
- b. Please confirm that you agree with this statement. If you do not confirm, please explain.

RESPONSE:

- a. Confirmed.

- b. Confirmed.