

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

RECEIVED
Nov 24 2 27 PM '99
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

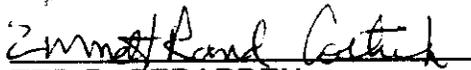
Experimental "Ride-Along")
Classification Change for Periodicals)

Docket No. MC2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: ALTAF H. TAUFIQUE (OCA/USPS-T1-9-15)
(November 24, 1999)

Pursuant to sections 25 and 26 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-T1-1-8 to witness Altaf H. Taufique, dated October 18, 1999, are hereby incorporated by reference.

Respectfully submitted,


TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6819

OCA/USPS-T1-9. Please refer to the testimony at page 7, lines 10-11, where it states that, "Almost 42 percent of Regular Rate Periodicals revenue is generated through CPP."

- a. Please explain how the figure of "42 percent" was derived. Please provide all supporting calculations.
- b. Does the 42 percent figure relate to FY98? If not, to what time period does it relate?
- c. Please provide the volume and the percent of total volume of Regular Rate Periodicals reported through the CPP for FY98.
- d. Please provide the weight and the percent of total weight of Regular Rate Periodicals reported through the CPP for FY98.
- e. If the 42 percent figure relates to a time period other than FY98, please provide the information requested in parts c. and d. of this interrogatory for that time period.

OCA/USPS-T1-10. Please refer to the testimony at page 7, lines 10-11, where it states that, "Almost 42 percent of Regular Rate Periodicals revenue is generated through CPP."

- a. Please provide the amount and percent of Nonprofit Rate Periodicals revenue generated through the CPP for FY98.
- b. Please provide the volume and the percent of total volume of Nonprofit Rate Periodicals reported through the CPP for FY98.

- c. Please provide the weight and the percent of total weight of Nonprofit Rate Periodicals reported through the CPP for FY98.
- d. If the 42 percent figure relates to a time period other than FY98, please provide the information requested in parts a., b. and c. of this interrogatory for that period.

OCA/USPS-T1-11. Please refer to the testimony at page 7, lines 10-11, where it states that, "Almost 42 percent of Regular Rate Periodicals revenue is generated through CPP."

- a. Please identify all other sources of the 58 percent of Regular Rate Periodicals revenue not generated through the CPP.
- b. Please identify all other sources of Nonprofit Rate Periodicals revenue not generated through the CPP.

OCA/USPS-T1-12. Please refer to your response to OCA/USPS-T1-1(a). Weight-related costs for advertising matter in Periodicals are recovered through zoned pound rates. Please confirm that there is no mark-up of the weight-related costs for advertising matter in the zoned pound rates for Periodicals. If you do not confirm, please explain and provide citations to Commission workpapers from Docket No. R97-1 where the mark-up occurs.

OCA/USPS-T1-13. Please refer to the testimony at page 7, lines 11-12.

- a. How many of the 12.6 million Standard (A) pieces enclosed or attached to Periodicals mailings were letters and how many were flats?

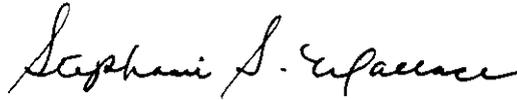
- b. How many of the 12.6 million Standard (A) pieces enclosed or attached to Periodicals mailings were above the "break-point" and how many were below the "break-point"?
- c. Please breakout the 12.6 million Standard (A) pieces enclosed or attached to Periodicals mailings according to the rates shown in the Standard Mail Rate Schedules 321.2A, 321.2B and 321.3 (excluding destination entry discounts).

OCA/USPS-T1-14. Please refer to the testimony at page 2, lines 11-14, where it states, "The Standard (A) postage applied is the same as a stand-alone Standard (A) piece would pay if it were mailed as a separate piece, even though the enclosure or attachment is processed and delivered with the host piece." How does the mailer determine which of the rates in the Standard Mail Rate Schedules 321.2A, 321.2B and 321.3 are applicable to the Standard (A) mail enclosed with or attached to a Periodicals publication? Please explain and provide copies of any forms used for this purpose.

OCA/USPS-T1-15. During the experiment, it is OCA's understanding that the Postal Service will collect data on the shape (e.g., letter, flat, etc.) and type (e.g., product sample, CD, printed matter, etc.) of "Ride-Along" pieces. Please explain how the Postal Service will associate data on "Ride-Along" pieces concerning number of pieces, weight, revenue and zone collected on the alternate Mailing Statement, Form 3541, with any data collected on shape and type of "Ride-Along" pieces.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink, reading "Stephanie S. Wallace". The signature is written in a cursive style with a large initial 'S'.

STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
November 24, 1999