

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

Postal Rate and Fee Changes, 2005 )

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS THOMAS E. THRESS  
(OCA/USPS-T7-1-5)  
(April 26, 2005)

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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T7-1. Please refer to USPS-LR-K-77, worksheet "A-2 Nonautomated Presort," and the line "NSA Adjustment." Please explain and show all calculations used to derive the NSA Adjustment of -\$116 for Nonautomated Presorted Letters, Flats and IPPs.

OCA/USPS-T7-2. Please refer to USPS-LR-K-77, worksheet "A-3-pg 1 Auto Presort Letters," and the line "NSA Adjustment." Please explain and show all calculations used to derive the NSA Adjustment of -\$151, -\$155, -\$945, and -\$657 for Mixed AADC Automation, AADC Automation, 3-Digit Automation, and 5-digit Automation, respectively.

OCA/USPS-T7-3. Please refer to USPS-LR-K-77, worksheet "A-3-pg 2 Auto Presort Flats," and the line "NSA Adjustment." Please explain and show all calculations used to derive the NSA Adjustment of -\$1 for 3-Digit Automation flats.

OCA/USPS-T7-4. Please refer to USPS-LR-K-77, worksheet "A-4 Carrier Route Letters," and the line "NSA Adjustment." Please explain and show all calculations used to derive the NSA Adjustment of -\$118 for Automated Carrier Route Letters.

OCA/USPS-T7-5. Please refer to USPS-LR-K-77, worksheet "A-9 NSA Discounts," and the line "Pieces."

- a. Please explain and show all calculations used to derive the volume of NSA pieces of 68,385.
- b. Please confirm that during the base year (FY 2004), the only NSA in effect was the NSA with Capital One. If you do not confirm, please explain.
- c. Please confirm that Capital One's estimated annual volume on which discounts were paid in FY2004 was 63,862,895 (69,184,803 / 13 \* 12). See

Docket No. MC2002-2, Data Collection Report, January 31, 2005, at  
Appendix A: page 1. If you do not confirm, please explain.