

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

Rate and Service Changes to Implement )  
Baseline Negotiated Service Agreement )  
with Bookspan )

Docket No. MC2005-3

OFFICE OF CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS MICHELLE K. YORGEY (OCA/USPS-T2-15-17)  
August 18, 2005

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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-T2-1-5 dated July 27, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-15. Please refer to your response to OCA/USPS-T2-9(g). If Bookspan's actual mail volume is 10.48 percent (0.104761904762) below the Year 2 negotiated volume commitment, or 85.048 million (95 million \* (1.00 – 0.1048)), please confirm that the Year 3 adjusted volume commitment will be 94 million (105 million – (105 million \* 0.1048)). If you do not confirm, please explain.

OCA/USPS-T2-16. Please refer to your response to OCA/USPS-T2-10, where it states “The Postal Service recognizes that Bookspan has been converting flats to letters for some time and has incentives to continue to do so independent of the NSA.”

- a. What “incentives” does Bookspan have to convert Standard Mail flats to letters independent of the NSA? Please explain.
- b. Is Bookspan the only Standard Mailer that has “incentives” to convert Standard Mail flats to letters independent of an NSA? Please explain.

OCA/USPS-T2-17. Please refer to your response to POIR No. 1, Question 1.

- a. Attachment 1, at pages 2 and 3, provided in response to Question 1(a)(i) and (ii), shows monthly and quarterly data for letters and flats separately for Fiscal Years 2003 and 2004. Please provide the monthly and quarterly data for letters and flats separately for Fiscal Year 2002.
- b. Refer to the response to Question 1(c), where it states “The analysis described in that subpart constitutes one of the ways in which the Postal Service attempts to model customer specific demand when a dearth of empirical information makes a more formulaic approach impractical.” Other

than the analysis described in the subpart, did the Postal Service develop any other analysis to model Bookspan's customer specific demand? Please explain.