

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
MOTION REQUESTING PRESIDING OFFICER TO
DIRECT BOOKSPAN TO FURNISH A COMPLETE ANSWER
TO QUESTION 4.A OF POIR NO. 1
(October 18, 2005)

The Office of the Consumer Advocate (OCA) hereby requests that the Presiding Officer direct Bookspan to provide a set of volume figures requested in Presiding Officer's Information Request No. 1, issued July 26, 2005, question 4.a., which has never been provided. OCA notes further that, not only has Bookspan not furnished the estimates requested by the Presiding Officer, it has never asked to be excused from answering the Presiding Officer's question.

Question 4.a. provides (emphasis added):

Bookspan witness Epp states that the significant drop in the before rates volume forecast for the first year of the agreement is "primarily due to the anticipated 5.4% increase in postage rates." Bookspan-T-2, page 11, lines 12-13.

a. Please provide a set of before *and after* rates volume estimates (separately for letters and flats) for each year of the agreement assuming that rates remain at current levels.

A review of the answer provided to question 4.a., on August 9, 2005 (corrected on September 29, 2005), reveals that witness Epp submitted *only* a set of before rates volume estimates (labeled "No rate hike, no NSA"). He did not, however, submit the after rates volume estimates called for in the question. OCA is now in the process of

preparing direct testimony that is currently due on October 24, 2005. A significant part of the OCA testimony is an assessment of the reliability of Bookspan's volume projections (both short- and long-term) and development of OCA's own volume projections. The missing volume estimates constitute a critical input to both elements of OCA's direct case. OCA respectfully requests that the Presiding Officer direct Bookspan to furnish the after rates estimates ("No rate hike, with NSA") at witness Epp's hearing on October 20, 2005.

Respectfully submitted,

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