

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

Postal Rate and Fee Changes, 2006 )

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DONALD J. O'HARA (OCA/USPS-T-31-1-3)  
(July 14, 2006)

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-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T31-1. Please confirm that nowhere in your testimony do you discuss the degree to which the Postal Service satisfies the service standards it has established for:

- a. Express Mail
- b. Priority Mail
- c. First Class
- d. Package Services

If you do not confirm this for a., b., c., or d., then provide a citation to your testimony where this is discussed.

OCA/USPS-T31-2. Consider the following hypothetical. The Postal Service establishes a 4-day service standard for a particular product. Do you agree that the value of service is higher if the 4-day standard is met 100% of the time, as opposed to 80% of the time?

If you do not agree, then please explain.

OCA/USPS-T31-3. Consider the following hypothetical. The Postal Service establishes 2 new products – A has a 4-day service standard; the other, B, has a 2-day service standard. A's 4-day service standard is met 100% of the time. B's 2-day service standard is met only 30% of the time and, in fact, delays are so severe that the average delivery time for B is actually 5 days. Holding all other factors equal, does A or B have a higher value of service? Please explain your answer.