

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW
(USPS/OCA-T5-25-27)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to Office of the Consumer Advocate witness Callow: USPS/OCA-T5-25 to 27.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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October 12, 2006

USPS/OCA-T5-25.

Please refer to your response to USPS/OCA-T5-18(d), where you state:

The values in OCA-T-5, Attachment 1 (Revised 9-22-06), columns W and X of worksheet "USPS Comps Platinum," were developed subsequent to the proposal being shared with Confirm subscribers and other interested parties.

The original question asked whether or not "values like those presented in the revised Attachment 1" of your testimony were included at the time of your proposal shared with any Confirm subscribers. Your response above appears to be limited to the columns in the revised attachment.

(a) Please explain whether or not data like those in the revised Attachment 1 were included in the proposal you shared with Confirm customers.

(b) If the data were included, did the data contain information similar to those presented in Column X of worksheet "USPS Comps Platinum" in revised version of Attachment 1 filed on September 22, 2006 (which were removed as part of your October 10, 2006 revision without any explanation).

USPS/OCA-T5-26.

Please refer to your response to USPS/OCA-T5-19, and Attachment 1 of your testimony as originally filed, and as revised on September 22, 2006 and October 10, 2006.

(a) Please confirm that, for an individual reading your original testimony on page 8, lines 7-11, your statement that they would face an increase of "up to 585 percent for 1 billion scans," and its associated footnote, imply that the array of cells from Z31 to AF31 relate to customers using 1 billion scans. If you do not confirm, please explain.

(b) Do you agree that your original testimony could have caused those that read it to become confused about the fee increases resulting from the Postal Service proposal? If you do not agree please explain.

(c) Please explain fully why the values in the limited number of cells populated in column Z of the October 10, 2006 revision of "USPS Comps Platinum" in Attachment 1 of your testimony are now significantly lower (with the exception of cell Z9) than when they were presented in the previous versions (column AF of the original version, "USPS Comps Gold&Plat", and column X of the September 22, 2006 version, "USPS Comps Platinum").

(d) Please confirm that the percentages presented in the following table accurately represent the differences between the two revised versions of Attachment 1 for all comparable cells. If you do not confirm, please explain.

Number of Scans (from 10-10-06 revision)	Millions of Units	USPS vs. Current: Proposed Increase % (rev. 10-10-06)	USPS vs. Current: Proposed Increase % (rev. 9-22-06)
357,143	1	-50%	-50%
5,000,000	14	-42%	62%
10,000,000	28	-37%	75%
15,000,000	42	-33%	89%
20,000,000	56	-28%	103%
25,000,000	70	-23%	116%
30,000,000	84	-18%	130%
35,000,000	98	-13%	144%
40,000,000	112	-10%	152%
45,000,000	126	-8%	159%
50,000,000	140	-5%	165%
55,000,000	154	-3%	172%
60,000,000	168	0%	179%

(e) Please confirm, based on the table presented in part (d), that a Platinum subscriber would be led to believe that using as few as 20 million scans would cost the subscriber more under the Postal Service proposal than under your

proposal. If you do not confirm, please explain.

(f) Please confirm that under the Postal Service proposal a Platinum subscriber using 20 million scans would not only pay less than half of what they would pay under your proposal, but would actually pay less than under the existing fee schedule. If you do not confirm, please explain.

(g) Please confirm that your original worksheet “USPS Comps Gold&Plat” of Attachment 1 indicated that all Platinum Confirm subscribers needing one or more additional blocks of units would face a fee increase of at least 42 percent. If you do not confirm, please explain.

(h) Please assume that a Platinum subscriber assumed that the increases you presented in your original (“USPS Comps Gold&Plat”) and first revision (“USPS Comps Platinum”) of Attachment 1 of your testimony were accurate. Please confirm that this Platinum subscriber would conclude that its fees would increase if fewer than 60,000,000 scans were used. If you do not confirm, please explain.

USPS/OCA-T5-27.

Please confirm that column headings in cells T8 and U8 of worksheet “USPS Comps Platinum” of Attachment 1 of your testimony (revised 10-10-06) is inaccurate, since the number of scans per unit are either 1 for First-Class Mail or 5 for Standard Mail. If you do not confirm, please explain. If you do confirm, please provide accurate column headings.