

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

Rate and Service Changes to Implement )  
Functionally Equivalent Negotiated )  
Service Agreement with Bradford Group )

Docket No. MC2007-4

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES  
TO UNITED STATES POSTAL SERVICE  
WITNESS BRODERICK A. PARR  
(OCA/USPS-T1-15-16)  
(August 29, 2007)

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-T1-1-4, dated August 10, 2007, are hereby incorporated by reference

Respectfully submitted,

Kenneth E. Richardson, Acting Director  
Office of the Consumer Advocate

Emmett Rand Costich, Attorney

901 New York Avenue, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6833; Fax (202) 789-6891  
e-mail: costicher@prc.gov

OCA/USPS-T1-15. Please refer to your response to OCA/USPS-T1-1, where it states, “The downward pressure on letter volume is only expected to continue in the absence of an incentive to increase letter volume.” Please confirm you are assuming that the NSA’s discounted rates will be solely responsible for any increase in the Bradford Group’s letter volumes that exceed the before-rates letter volume forecast. If you do not confirm, please explain.

OCA/USPS-T1-16. Please consider the following statement:

Once discounts intended to influence mailer behavior are established, it is not possible to ‘observe’ what mailer behavior would have been without such discounts.

Docket No. MC2002-2, Tr. 4/767 (Response of Witness Plunkett to POIR No. 2, Question 5).

- a. Please confirm that this statement is still accurate. If you do not confirm, please explain.
- b. Please confirm that you agree with this statement. If you do not confirm, please explain.