

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH HSBC NORTH
AMERICA HOLDINGS INC.

Docket No. MC2005-2

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-1)
(April 8, 2005)

The United States Postal Service hereby provides its response to the following interrogatory of the Office of Consumer Advocate: OCA/USPS-1, filed on March 29, 2005.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 8, 2005

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OCA**

OCA/USPS-1. Please confirm that Jim Wilson, who testified on behalf of the Postal Service in Docket No. MC2002-2, spoke at the National Postal Forum, held in Nashville, TN, in March 2005. If the Postal Service does not confirm, then please provide an explanation.

- a. Confirm that topics addressed in his presentation included the National Change of Address (NCOA) service, Address Change Service (ACS), and NCOALink. If the Postal Service does not confirm, then please explain.
- b. Confirm that, at the Forum, the Postal Service presented the results of data from an "average" 20-million-piece First-Class mailing where the NCOA service was utilized prior to the mailing and ACS was used when the pieces were mailed. If the Postal Service does not confirm, then please explain.
- c. Confirm that the 20 million-piece-mailing revealed that when an address was ZIP+4 coded, 91.7% of the mail was delivered, 5.94% of the mail was returned, and 2.35% of the mail was forwarded. If the Postal Service does not confirm, then please explain.

RESPONSE:

Confirmed.

- a) Confirmed.
- b) Not confirmed. The reference to an "average" was not presented by Mr. Wilson in association with the data relating to the 20 million piece First-Class mailing.
- c) Confirmed for the mailing for which data were presented, but exclusively with respect to the pieces that were ZIP+4 coded. Please note that there was an assumption that what was not returned and not forwarded was delivered.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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