

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3 67

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T4-10-16)
(July 10, 1996)

Pursuant to sections 25 and 26 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 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

David Ruderman

DAVID RUDERMAN
Attorney



OCA/USPS-T4-10. Refer to LR-SSR-119, Sheet 8, which contains the subtotal for "Space Support".

- a. Please confirm that the subtotal for Space Support is \$193,853,000. If you do not confirm, please explain.
- b. Please explain the difference between the amount for Space Support in "a." above, and amount for the Space Support category on page 35, line 11 of your testimony.
- c. Please provide the correct amount for the Space Support category.

OCA/USPS-T4-11. Refer to LR-SSR-119, Sheet 8, which contains the subtotal for "All Other."

- a. Please confirm that the amount for All Other is \$108,799,000. If you do not confirm, please explain.
- b. Please explain the difference between the amount for All Other in "a." above, and amount for the All Other category on page 35, line 13 of your testimony.
- c. Please provide the correct amount for the All Other category.

OCA/USPS-T4-12. Refer to LR-SSR-119, Sheet 8, and the amount \$217,853 in the column "TOTAL ACCRUED (\$1,000)" for "C/S 18.2.5 INTEREST EXPENSE-BLDG & LEASEHOLD (COMPONENT 215)".

- a. Please provide the calculations used to derive the amount \$217,853.
- b. To the extent cost figures used in the calculations of the amount referred to in "a." above are not contained in the document "Cost Segments and Components, Fiscal Year 1994", please provide documents containing those figures.

OCA/USPS-T4-13. Refer to page 34, lines 5-6, of your testimony where it states "[a]ttributable costs are derived from the Cost Segments and Components Report for FY 1994". Please explain why attributable costs for post office boxes are derived from the Cost Segments and Components Report for FY 1994 rather than the Cost Segments and Components Report for FY 1995.

OCA/USPS-T4-14. Refer to page 35, line 6, of your testimony. Please confirm that the number "4." was inadvertently placed there. If you do not confirm, please explain.

OCA/USPS-T4-15. Refer to page 44, Table 18, of your testimony.

- a. Please confirm that no attributable costs are allocated to Delivery Group III post office boxes. If you do not confirm, please explain.
- b. Please confirm that attributable costs for Delivery Group III post office boxes are allocated to Delivery Group I-A, I-B, I-C, and Delivery Group II post office boxes. If you do not confirm, please explain.
- c. Please provide attributable costs per box for Delivery Group III in the same form as Table 18, or in the alternative, provide total attributable costs for Delivery Group III.
- d. Please explain why the attributable costs for Delivery Group III (proposed Group E) post office boxes should not be treated as institutional costs.

OCA/USPS-T4-16. Refer to LR-SSR-93, Item 1, page 3.

- a. Please define and describe the following box types:
 - (1) business and residential facility boxes,
 - (2) contract boxes, and
 - (3) detached boxes.

- b. Please identify where each box type defined and described in "a." above is located in relation to Delivery Group I-A, I-B, I-C, Delivery Group II, and Delivery Group III post offices.

Docket No. MC96-3

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



DAVID RUDERMAN
Attorney

Washington, DC 20268-0001

July 10, 1996