

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS NEEDHAM
(OCA/USPS-T8-10)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T8-10, filed on July 11, 1996, redirected from witness Needham.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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July 25, 1996



Answer of Richard Patelunas to the Interrogatories of
Office of the Consumer Advocate
to United States Postal Service
(Redirected from witness Needham)

OCA/USPS-T8-10.

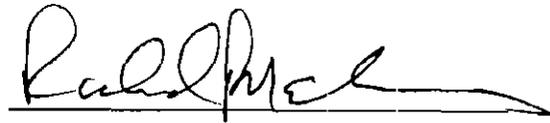
Please provide a citation to witness Patelunas' testimony or exhibits for the after rates cost figure of \$214,021 shown in USPS-T-1 (Lyons), Exh. C.

OCA/USPS-T8-10:

The \$214,021 amount does not appear in my testimony or exhibits. To understand how this amount is calculated, see Library Reference SSR-104, pages 7-11. Return Receipt costs in the Cost and Revenue Analysis report and the rollforward as described in my testimony and workpapers are not captured separately. Rather, return receipt costs are a portion of the total US Postal Service attributable costs and the Special Services Other costs. See USPS-T-5H, page 8, column marked "Total".

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", written over a horizontal line.

Dated: 7-25-96

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Susan M. Duchek
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