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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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



SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T7-1, 2(B), 3, AND 4)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T7-1, 2(b), 3, and 4, filed on June 20, 1996. Interrogatory OCA/USPS-T7-2(a) was redirected to witness Lion.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 3, 1996

RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM TO INTERROGATORIES
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OCA/USPS-T7-1. Refer to Table 1 on pages 3 and 4, and USPS-T-22,
Exhibit 22-B (revised 11/21/90) from Docket No. R90-1.

- a. Please confirm that the cities listed in Exhibit 22-B for Category A and B level post office box charges ("surcharges") are the same cities that will be in the proposed fee Groups A and B. If you cannot confirm, please provide a list of cities in proposed fee Groups A and B.
- b. Please confirm that the ZIP Codes by city listed in Exhibit 22-B for Category A and B level fees ("surcharges") are the same ZIP Codes by city that will be in the proposed fee Groups A and B. If you cannot confirm, please provide a list of ZIP Codes by city for proposed fee Groups A and B.

RESPONSE:

- a. Confirmed.
- b. Technical corrections to the list of ZIP Codes in Exhibit 22-B were made in 1992 so that, for example, the list included box section ZIP Codes rather than carrier delivery only ZIP Codes. DMM §910.4.3 (attached) provides a list of the current ZIP Codes for subgroups IA and IB, which are the same ZIP Codes as those for proposed Groups A and B.



Box Size Fees are generally related to box size, determined by the following cubic-inch capacities:

4.2

Box Size	Capacity
1	Under 296 cubic inches
2	296 through 499 cubic inches
3	500 through 999 cubic inches
4	1,000 through 1,999 cubic inches
5	2,000 or more cubic inches

Group 1 Group 1 fees:

4.3

- Apply to customers at all facilities of a city delivery post office who are eligible for any kind of delivery by postal carrier. A customer ineligible for any kind of delivery by postal carrier may use one box at Group 2 fees. (Delivery to additional boxes may be obtained at the applicable Group 1 fee.)
- All customers who receive mail at a mail processing facility that is not under the administration of a post office must pay Group 1 fees.
- Are for a semiannual (6-month) period; one or two periods may be paid at the same time.
- Are divided into three categories as shown in Exhibit 4.3. The customer must pay the category of Group 1 fee corresponding to the post office where the box is located.

P.O. Box Service Categories
Exhibit 4.3

Category	Post Office	ZIP Codes
1A	New York, NY	10001-10299
1B	Staten Island, NY	10301-10399
	Boston, MA	02113, 02115, 02117, 02123, 02134, 02135, 02139, 02140, 02142, 02146, 02158-02162, 02164-02168, 02178, 02179, 02181, 02205, 02214-02216, 02218, 02233
	Long Island City, NY	11101-11199
	Brooklyn, NY	11201-11299
	Queens (Flushing), NY	11301-11399
	Queens (Jamaica), NY	11401-11499
	Queens (Far Rockaway), NY	11601-11699
	Philadelphia, PA	19101-19104, 19105, 19107
	Washington, DC	20004-20009, 20013, 20026, 20033, 20035, 20036, 20037, 20038, 20043, 20044, 20050, 20056
	Bethesda, MD	20813, 20824, 20825, 20827
	Arlington, VA	22202, 22209, 22210, 22216
	McLean, VA	22103
	Chicago, IL	60606, 60610, 60611, 60654, 60664, 60680-60681, 60684, 60690
	Los Angeles, CA	90019, 90024, 90025, 90034, 90035, 90048, 90049, 90064, 90067, 90069
	Beverly Hills, CA	90210-90212
	Santa Monica, CA	90401-90405
	San Francisco, CA	94101, 94107, 94108, 94126, 94133, 94147, 94159, 94164
	Honolulu, HI	96801-96815, 96830
1C	All post offices that have city delivery by USPS carrier and are not listed in Group 1A or 1B.	

Group 2 Group 2 fees apply to customers at non-city delivery (NCD) offices. Group 2 fees for box sizes 3, 4, and 5 are for a semiannual (6-month) period. One or two periods may be paid at the same time for these sizes. Group 2 fees for box sizes 1 and 2 are for an annual period and may be paid for one period only.

4.4

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OCA/USPS-T7-2. Refer to Table 1 on pages 3 and 4.

- a. Please provide a list of ZIP Codes by state for proposed Group E post offices for which **no** city or rural delivery service is available and customers will "pay" proposed Group E fees of \$0.00.
- b. Please provide a list of ZIP Codes by state for proposed Group E post offices for which city or rural delivery service **is** available and customers will pay proposed Group D fees.

RESPONSE:

- a. Redirected to witness Lion.
- b. There are no such ZIP Codes. By definition, proposed group E post offices would have neither city nor rural delivery.

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OCA/USPS-T7-3. Refer to pages 21 and 22 concerning "nondelivery" offices.

- a. What are the proposed box fees for residential and business customers domiciled within a Group E service area that are **not** eligible for any kind of delivery service who seek box service at another Group E post office?
- b. What are the proposed box fees for residential and business customers domiciled within a Group E service area that are **not** eligible for any kind of delivery service who seek box service at a Group D post office? Do such customers who seek box service at a Group D post office pay the Group D box fees, or the \$0.00 Group E box fees?
- c. Does the proposed non-resident fee apply to such customers?

RESPONSE:

- a. If there are no available boxes at their service area post office, Group E box customers are eligible to secure one box at another Group E post office for the proposed \$0.00 fee. If, however, there are available boxes at their service area post office, under my proposal Group E box customers seeking box service at another Group E post office would pay the proposed non-resident fee only.

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b.& c. The proposed box fees for Group E domiciled customers seeking box service at a Group D post office would be the proposed Group D fees for the appropriate size box, plus the non-resident fee.

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OCA/USPS-T7-4. Refer to page 24 concerning the applicability of the "non-resident" fee.

- a. Does the proposed non-resident fee apply to customers of caller service?
- b. If you answer in the affirmative, does it apply on the same basis as the non-resident fee for box service customers?
- c. If it does not apply, please explain.

RESPONSE:

- a. No. See USPS-T-7, page 6, Table II footnote.
- b. Not applicable.
- c. As mentioned on page 37 of my testimony (USPS-T-7), caller service generally does not require permanently dedicated space as do post office boxes. Consequently, non-resident caller service customers do not reduce the availability of caller service for residents. On the other hand, non-resident box service customers might force residents of that post office's service area to seek box service elsewhere. Consequently, the non-resident fee would not apply to caller service customers.

DECLARATION

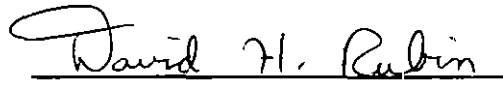
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: July 3, 1996

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.


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