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BEFORE THE JUL 10 4 29 PM '96  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS LION TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS NEEDHAM  
(OCA/USPS-T7-2(A))

The United States Postal Service hereby provides the response of witness Lion to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T7-2(a), filed on June 20, 1996, and 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

David H. Rubin  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1145  
(202) 268-2986; Fax -5402  
July 10, 1996

POSTAL RATE COMMISSION  
DOCKET  
JUL 10 1996  
OFFICE OF THE SECRETARY

RESPONSE OF POSTAL SERVICE WITNESS LION TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE,  
REDIRECTED FROM WITNESS NEEDHAM

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.

RESPONSE:

Please see library reference SSR-125 for a preliminary list of ZIP Codes for proposed Group E post offices. For Group E offices, as proposed, no city or rural delivery service is available, and the proposed box fee is \$0.00. It is my understanding that this list is only an approximation based on current information, which does not include any implementing regulations; accordingly, the list, which also has not been checked for accuracy as to each individual ZIP Code, may be both overinclusive and underinclusive. Moreover, the list would be expected to change prior to implementation to the extent that delivery is extended from additional offices. The list does not include nondelivery ZIP Codes at which no boxes are currently installed. Branches and stations that do not provide delivery are not included if delivery is provided by the administering post office, since such customers would presumably be eligible for delivery in such circumstances.

**DECLARATION**

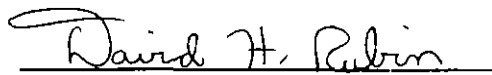
I, Paul M. Lion, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul M Lion

Dated: 7/10/96.

**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.

  
\_\_\_\_\_  
David H. Rubin

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