

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

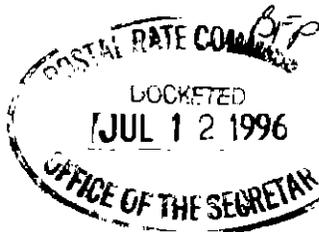
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T4-17-20)
(July 12, 1996)

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
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney

OCA/USPS-T4-17. Refer to Table 16 on page 40 of your testimony, and the Grand Total for "Space Support" costs.

- a. Please confirm that the Grand Total for Space Support is \$193,453,000. If you do not confirm, please explain.
- b. Please explain the difference between the amount for Space Support in "a." above, and the amount for the Space Support category on page 35, line 11 of your testimony.
- c. Please explain the difference between the amount for Space Support in "a." above, and the subtotal for Space Support in LR-SSR-119, Sheet 8.
- d. Please provide the correct amount for the Space Support category.

OCA/USPS-T4-18. Refer to Table 17 on page 43 of your testimony. Please confirm that the allocation of Space Provision costs on a per box basis does not rely on the computations in the column Percentage of Equivalent Capacity. If you do not confirm, please explain.

OCA/USPS-T4-19. Refer to footnote 10 on page 36 of your testimony and LR-SSR-119, Sheet 8. Please confirm that Segment 18 costs for workers compensation, FERS retirement, and holiday leave are apportioned between the All Other cost category and the

Space Support cost category on the basis of related salary costs.

If you cannot confirm, please explain.

OCA/USPS-T4-20. Refer to page 36, line 1, of your testimony where it states "A similar analysis [for space support costs] was presented in Docket No. R90-1." Please explain any differences between the allocation of Space Support costs presented in your testimony and that presented in Docket No. R90-1.

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, D.C. 20268-0001
July 12, 1996