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

JUL 15 4 43 PM '96
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LION TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T4-8-9)

The United States Postal Service hereby provides responses of witness Lion to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-8-9, filed on July 1, 1996.

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

Respectfully submitted,

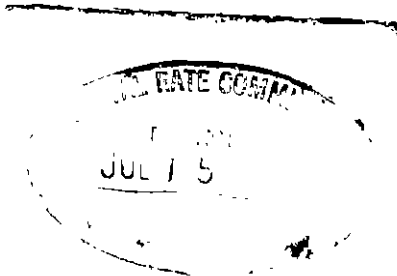
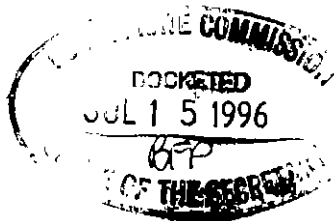
UNITED STATES POSTAL SERVICE

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 15, 1996



RESPONSE OF POSTAL SERVICE WITNESS LION TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T4-8. Refer to page 21 of your testimony concerning fees for CMRA boxes. Please confirm that commercial mail receiving agents (CMRAs) do not assess a non-resident fee on CMRA box holders.

RESPONSE:

This question was not asked in the survey, so we are unable to confirm whether CMRAs do or do not assess non-resident fees. In general terms, I would expect CMRAs to be operated like many private businesses, and charge what the market will bear.

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OCA/USPS-T4-9. Refer to page 3, lines 3-5, of your testimony where it states that “the main purpose of [the study] was to inventory the number of boxes in different sizes and delivery groups.”

- a. Please provide by delivery Group and box size a count of boxes rented by individuals.
- b. Please provide by delivery Group and box size a count of boxes rented by all other entities (other than individuals).

Where quantitative data is not available, please provide percentage estimates of the information requested in a. and b. above.

RESPONSE:

Information on whether boxes were rented by individuals or “other entities” was not collected;

I have no basis for making the requested estimates.

DECLARATION

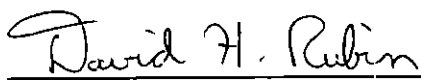
I, Paul M. Lion, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Paul M. Lion

Dated: 7/15/96

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

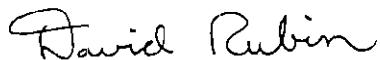
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intend to advise the Commission of the prospects for partial settlement of issues shortly after the conclusion of discovery on the Postal Service, during August.

Should you wish to discuss these matters further with us, please do not hesitate to call the undersigned at (202) 268-2986 or Tony Alverno at (202) 268-2997.

Thank you for your cooperation.

Best regards,



David Rubin
Attorney

Enclosure

cc: Postal Rate Commission

PARTICIPANT EXPRESSION OF INTEREST IN PARTIAL SETTLEMENT
IN DOCKET NO. MC96-3

The participant below, represented by the undersigned and in response to the July 19, 1996 letter of the Postal Service concerning partial settlement in Docket No. MC96-3, hereby indicates, as of the date of this reply, whether the participant intends to oppose consideration of a partial settlement of issues on the following proposals:

Opposed to Partial Settlement	Not Opposed to Partial Settlement
___	___ Insurance (including insured mail and Express Mail)
___	___ Registry
___	___ Stamped Cards (now known as postal cards)
___	___ Special Delivery*
___	___ Certified Mail*
___	___ Return Receipt*

Participant understands that by returning this reply, the participant is not obligated to sign or agree to any forthcoming proposed or final stipulation or settlement. Participant further understands that the results of this reply will be reported to the Postal Rate Commission.

Provisions to arrange for confidentiality of this reply or any other expression of interest in settlement should be arranged in advance with counsel for the Postal Service.

Participant Name _____
Date _____
Counsel/Representative Signature _____
Telephone Number _____

PLEASE MAIL OR FAX THIS FORM NO LATER THAN AUGUST 27, 1996 TO:

A. Alverno
Attorney, National Litigation Section
United States Postal Service
475 L'Enfant Plaza SW
Washington, D.C. 20260-1137
Fax (202) 268-5402

* Although participants have to date expressed opposition to settlement of these proposals, we would nonetheless appreciate your indicating interest in settlement to these proposals in the event of a reversal or reconsideration of an opponent's position.