

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

FOLLOW-UP INTERROGATORY OF THE
OFFICE OF THE CONSUMER ADVOCATE TO
UNITED STATES POSTAL SERVICE
WITNESS W. ASHLEY LYONS
(OCA/USPS-T1-15)
(July 18, 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 an interrogatory and a request 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-T1-15. Please refer to your response to the redirected interrogatory OCA/USPS-T8-7. Taking into account the elimination of special delivery service, the test year after rate (TYAR) volumes are as follows:

<u>Class</u>	<u>TYAR</u> Pieces (000)
Letters Non-Presort	90
Priority	7
Third Class Single Piece	3
Parcel Post	4
Express Mail	103
Special Delivery Feature	<u>0</u>
Total	207

- a. Footnote one of the response refers to Special Delivery Transactions developed in USPS-T-1, WP B. USPS-T-1, WP B, Special Delivery Transactions contains a footnote that refers to USPS-LR-SSR-40. USPS-LR-SSR-40 consists of five computer files. The first line of the computer file "CATMAST" states "TOTAL ALL DATA - THIS REPORT IS ESSENTIALLY OBSOLETE." Please explain why an obsolete file was used to allocate special delivery transactions. In your response, include the rationale for assuming that an obsolete file provides valid data for use in Docket No. MC96-3.

- b. At present, the five files provided in USPS-LR-SSR-40 can only be viewed as a text file. Therefore, it is impossible to determine what data were used to develop the distribution ratios referred to and how those proportions were calculated. Please provide the derivation of the proportions used to calculate the shift of the 207,000 pieces identified in your response to OCA/USPS-T8-7. Your response should include cites to all sources used and copies of all source documents not previously provided.
- c. Please provide and identify the cross elasticities used on those pieces migrating from special delivery to each of the classes identified in your response to OCA/USPS-T8-7.

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, DC 20268-0001
July 18, 1996