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

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LANDWEHR TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T3-1-3)

The United States Postal Service hereby provides responses of witness Landwehr

to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-

T3-1-3, filed on July 10, 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

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Kenneth N. Hollies

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Responses of Witness Landwehr to OCA/USPS-T3-1-3, page 1, Docket No. MC96-3.

OCA/USPS-T3-1. In your testimony at 2, you indicate that Villa Rica presently has no caller service customers. Your testimony at 3 indicates that the Villa Rica facility is a fairly typical post office.

- a. For each of the Post Office box sizes at the Villa Rica post office, please indicate the number of boxes held by resident businesses, nonresident businesses, nonprofit resident organizations, nonprofit nonresident organizations, resident nonbusinesses and nonresident nonbusinesses.
- b. You state in your testimony that there are currently no caller service customers at Villa Rica. For the most recent fiscal year for which information is available, please indicate the number of post offices that have caller service customers, the number of caller service customers per post office, and the average annual volume of mail delivered to a caller service customer.
- c. What action would be taken by the Villa Rica Post Office if a nonbusiness resident requested a post office box and there were no unused post office boxes available in the size requested by that customer?
- d. What action would be taken by the Villa Rica Post Office if a nonbusiness nonresident requested a post office box and there were no unused post office boxes?
- e. What action would be taken by the Villa Rica Post Office if a business resident requested a post office box and there were no unused post office boxes?
- f. What action would be taken by the Villa Rica Post Office if a business nonresident requested a post office box and there were no unused post office boxes?

RESPONSE:

1.a. The only information available regarding these box holders consists

of their box applications, which a manual review of reveals that

the Villa Rica Post Office has 149 businesses and 561

individual post office box customers. The current post office

box application does not provide any other information that

would identify nonprofit or residence status.

1.b. While I have no information that would permit me to answer this guestion and I understand the Postal Service has no means of

Responses of Witness Landwehr to OCA/USPS-T3-1-3, page 2, Docket No. MC96-3.

ascribing mail volume to individual caller box customers, witness Lion informs me that based upon his study 4,092 post offices offer caller service to an average of 25 customers each.

1.c-f. There are no regulations or guidelines for this procedure but as a business practice, I have instructed my employees first to: 1) offer the customer the next available box size; then 2) offer to put the customer on a waiting list; and finally 3) suggest that the customer seek box service at a neighboring facility. Responses of Witness Landwehr to OCA/USPS-T3-1-3, page 3, Docket No. MC96-3.

OCA/USPS-T3-2. In your testimony at 4, you indicate that the Middleburg, VA, Post Office has a waiting list of 15 to 20 prospective customers.

a. Please specifically identify, how many of the Middleburg, VA, post office box holders are: resident nonbusinesses, nonresident nonbusinesses, resident businesses, nonresident businesses, resident nonprofit organizations, and nonresident nonprofit organizations.

b. Of the 15 to 20 wait listed prospective post office box customers, how many are: resident nonbusinesses, nonresident nonbusinesses, resident businesses, nonresident businesses, resident nonprofit organizations, and nonresident nonprofit organizations?

c. Please describe the process used to determine who on the waiting list will be offered the next available post office box?

d. If a post office box becomes available to rent, is there any preference given to offering the box to a resident versus a nonresident?

e. If a post office box becomes available to rent, is there any preference given to offering the box to a resident business versus a resident nonbusiness?

f. You indicated that the Middleburg, VA, Post Office has a waiting list for post office boxes. Assume that a current nonresident-post-office-box holder's fee is up for renewal. Which methodology does the Postal Service follow: offer the box to the first resident on the waiting list, or allow the current box holder to renew their post office box service without reviewing resident status?

g. Does the Postal Service currently offer post office box service on a first-come first-serve basis?

RESPONSE:

2.a. The only information available regarding these box holders consists of

their box applications, which a manual review of reveals that the

Middleburg Post Office has 366 business and 1490 individual post office

box customers. The current post office box application does not provide

any other information that would identify nonprofit or residence status.

2.b. There are no regulations or guidelines for maintaining and managing a

post office box waiting list. I would record the customer's name, phone

number and date of request; I understand the Middleburg postmaster

Responses of Witness Landwehr to OCA/USPS-T3-1-3, page 4, Docket No. MC96-3.

does the same. Hence, the existing Middleburg waiting list provides no further basis for answering the question.

- 2.c-e. There are no regulations or guidelines for the maintenance and management of a post office box waiting list. I understand that in general boxes are offered to customers on a first come first serve basis, although customers who are ineligible for carrier delivery may sometimes be given priority.
- 2.f. Since resident status is not pertinent to box holder's renewal rights, boxes are first made available to incumbent box holders.
- 2.g. Yes, although as previously noted, eligibility for duplicate delivery service can also be important.

Responses of Witness Landwehr to OCA/USPS-T3-1-3, page 5, Docket No. MC96-3.

OCA/USPS-T3-3. In your testimony at 7 and 10, you suggest that one of the problems with non-resident customers is that all communications are long-distance.

- a. Does the Postal Service call collect, or otherwise charge, non-resident box holders?
- b. If the Postal Service does not have a policy of calling collect why does it not have this policy?

RESPONSE:

- 3.a. No.
- 3.b. While I am not a policy witness in this case, I can only assume that postal

policy makers have not found sufficient need for such a policy.

DECLARATION

I, John F. Landwehr, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

m l 2-22-96 Dated:

John F. Landwehr

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.

Kh Hollin

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1145 July 24, 1996