

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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OFFICE OF THE SECRETARY

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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(OCA/USPS-T5-18-23)
(July 26, 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

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney

POSTAL RATE COMMISSION
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OCA/USPS-T5-18. The following interrogatory refers to exhibit USPS-T-5H, FY96AR Cost Segment Summary for Special Services.

- a. Please explain why Special Delivery continues to appear as a Special Service.
- b. Please explain why Stamped Cards are not listed as a Special Service.
- c. The following refers to cost segment 16 at 49. Please explain what is included in the \$3,760,000 stamp and dispenser postal card costs.

OCA/USPS-T5-19. Please refer to SSR-90 and to library reference G-127, pages 31-32, R94-1. The Form 22 Density System is described in the library reference titled "Statistical System Documentation" in docket R94-1 but is missing from the MC96-3 "Statistical System Documentation" library reference. Please explain whether that system is still in existence and describe its status as one of the statistical systems.

OCA/USPS-T5-20. Please complete the documentation of the Rural Carrier System sample design documentation on pages 37-41 of library reference SSR-90.

- a. Please provide universe size at sample selection, sampling rates, and effective sample sizes by strata.
- b. Please provide the weighting factors and the formulas used to produce the weighting factors.
- c. Please provide instructions and estimation formulas for the proper use of weighting factors.
- d. Please describe the extent of second stage sampling that occurs.
 - i. How many rural routes in the universe of routes serve more than one office?
 - ii. How many rural routes in the RCS sample for FY95 serve more than one office?
 - iii. Are there any effects on the weighting factors for sample routes that serve more than one office? If so, please explain.

OCA/USPS-T5-21. Please describe any sampling or estimation changes for the Rural Carrier System that have been put in place since the FY92 sample.

OCA/USPS-T5-22. Please refer to Table 11 on page 40 of

SSR-90. Most C.V. estimates reported in this table are

considerably smaller than those reported in library reference G-127 of FY93. Please describe any changes to the design or estimation methodology that could account for these decreases.

OCA/USPS-T5-23. Refer to your response to Presiding Officer's Information Request No. 1, question 1, and USPS-T-4, page 35, line 13, concerning All Other costs. Your response states that the labor costs of sorting mail to boxes is \$451,581,000. According to witness Lion, "All Other costs are primarily labor costs for sorting mail to boxes . . . ," which amounts to \$109,159,000. Please explain why the costs you identify as labor costs of sorting mail to boxes are greater than the labor costs belonging in the All Other cost category in witness Lion's testimony.

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.

Shelley Dreifuss
SHELLEY DREIFUSS
Attorney

Washington, DC 20268-0001
July 26, 1996