

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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS W. ASHLEY LYONS
(OCA/USPS-T1-23-26)
(July 30, 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.

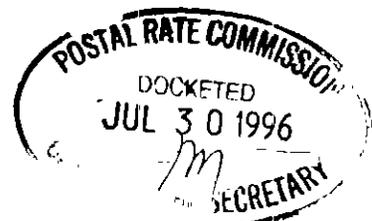
Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

David Ruderman

DAVID RUDERMAN
Attorney



OCA/USPS-T1-23. USPS witness Needham's testimony, USPS-T-7 at 23-24, states,

[N]on-residents would be defined as those individual or business boxholders whose residence or place of business is not located within the 5-digit ZIP Code area of the office where box service is obtained. In those circumstances where a local street address is not confirmed by a postal employee in the office where the box is located, individual boxholders would be asked to provide proof of residency

Several proof of residency alternatives are listed in her testimony. Not all of the alternatives identified include a photo.

- a. Will a postal employee verify that the applicant actually resides at the street address listed on the boxholder application?
- b. Please explain how the Postal Service will confirm that the boxholder applicant actually lives at the street address provided.
- c. If photo identification is not required by the Postal Service, please explain how postal employees will verify the identity of the applicant.

OCA/USPS-T1-24. Assume that a state, such as Arizona, issues a driver's license that may have either a post office box address on the license or a physical mailing address.

- a. What form of identification will the Postal Service require of postal patrons to verify that the post office box applicant is a local resident?
- b. Will the Postal Service implement different identification requirements based upon the locality?

OCA/USPS-T1-25. Refer to your response to Presiding Officer's Information Request No. 1., question 10. Please provide the "number of box customers at both postal and contract non-delivery post offices . . . [who] will be paying \$0 under the Postal Service's proposal."

OCA/USPS-T1-26. Refer to your response to Presiding Officer's Information Request No. 1., question 10. Please confirm that the figure, 338,510, referenced in LR-SSR-93 at page 6, represents the number of post office boxes tabulated from Group III post offices, even though Group III post offices were not surveyed in the post office box study. If you do not confirm, please explain.

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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
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July 30, 1996