

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 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 PAUL M. LION
(OCA/USPS-T4-27-37)
(August 2, 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,

Emmett Rand Costich for

GAIL WILLETTE
Director
Office of the Consumer Advocate

David Ruderman

DAVID RUDERMAN
Attorney

OCA/USPS-T4-27. Refer to your response to OCA/USPS-T4-15(d).

- a. Please explain why the calculation of Delivery Group E attributable costs is impossible. Please identify any data necessary to make the calculations.
- b. What evidence to the contrary do you have that the attributable cost of Delivery Group E is not 1.6 percent of total post office box attributable costs for the test year?
- c. Assume the attributable cost of Delivery Group E is 1.6 percent of total post office box attributable costs. Please explain the rationale for not treating these costs as institutional costs.

OCA/USPS-T4-28. Refer to LR-SSR-104 in this proceeding, and USPS LR-F-180, which presents updated caller service costs for Docket No. R90-1.

- a. Please list each item incorporated in the calculation of caller service costs in LR-SSR-104 that is based on studies, material or analyses conducted in FY 1979 or earlier.
- b. Please provide an estimate of the time and cost to update the studies, materials or analyses referred to in "a" above.

OCA/USPS-T4-29. Refer to LR-SSR-104 in this proceeding, and USPS LR-F-180, which presents updated caller service costs for Docket No. R90-1.

- a. Please confirm that the average time per separation of 8.1851 minutes used to determine the cost of window service-accounting functions for caller service in LR-SSR-104 was based on data and computed using the same methodology as LR-F-180. If you do not confirm, please explain.
- b. Please explain whether the average time per separation of 8.19 minutes used to determine the cost of window service-accounting functions for caller service in LR-F-180 is based on studies, materials or analyses conducted in FY 1979 or earlier? See Docket No. R90-1, USPS LR-F-180, Update of Cost Analysis for Caller Service, February 1990 at 11.
- c. Please identify any data used to calculate the average time per separation in LR-SSR-104 that have been updated since 1979.
- d. For any data used in the calculation of the average time per separation in LR-SSR-104 that have not been updated since the 1979, please identify the data and explain why they were not updated for this proceeding.

OCA/USPS-T4-30. Refer to LR-SSR-104, Exhibit II, concerning the average time per separation.

- a. What efforts were taken to verify that the average time per separation determined in LR-SSR-104 is currently 8.1851 minutes? Please explain any such efforts and provide any documentation.
- b. If no efforts were taken, please explain your basis for believing that the average of 8.1851 minutes per separation remains accurate.

OCA/USPS-T4-31. Refer to LR-SSR-104 in this proceeding, and USPS LR-F-180, which presents updated caller service costs for Docket No. R90-1.

- a. Other than the hourly labor rate of \$23.939 and the number of large and small firms, please confirm that the determination of window and platform delivery costs for large and small firms in LR-SSR-104 was based on data and computed using the same methodology as LR-F-180. If you do not confirm, please explain.

- b. Please explain whether the calculations used to derive the total annual window/platform delivery costs for large and small firms in LR-F-180 are based on studies, materials or analyses conducted in FY 1979 or earlier? See Docket No. R90-1, USPS LR-F-180, Update of Cost Analysis for Caller Service, February 1990 at 12-13.
- c. Please identify any data used to calculate the total annual window/platform delivery costs for large and small firms in LR-SSR-104 that have been updated since 1979.
- d. For any data used in the calculation of total annual window/platform delivery costs for large and small firms in LR-SSR-104 that have not been updated since the 1979, please identify that data and explain why they were not updated for this proceeding.

OCA/USPS-T4-32. Refer to LR-SSR-104, page 1, concerning the number of separations per caller.

- a. What efforts were taken to verify that the number of separations per caller is currently 2.32? Please explain any such efforts and provide any documentation.

- b. If no efforts were taken, please explain why the number of separations per caller was not reevaluated for this proceeding.
- c. If no efforts were taken, please explain your basis for believing that the 2.32 separations per caller remains accurate.

OCA/USPS-T4-33. Refer to LR-SSR-104, page 6, concerning the determination of storage costs for caller service.

- a. What efforts were taken to verify that the number of square feet allocated per firm is currently 4.1 square feet?
Please explain any such efforts and provide any documentation.
- b. If no efforts were taken, please explain why the number of square feet allocated per firm was not reevaluated for this proceeding.
- c. If no efforts were taken, please explain your basis for believing that the 4.1 square feet allocated per firm remains accurate.

OCA/USPS-T4-34. Refer to LR-SSR-104, Exhibit I, concerning the calculation of attributable costs for caller service.

- a. Please confirm that the figure of 100,770 represents the number of entities that pay a caller service fee. If you do not confirm, please explain what it does represent and why it is used in the calculation of caller service costs.
- b. In determining caller service attributable costs, please explain why the annual cost per caller of \$667.08 is divided by 2.32 to reach an annual cost of \$287.54 per call number or separation. Please explain why the \$287.54 amount rather than the \$667.08 amount used to calculate the attributable cost of caller service.

OCA/USPS-T4-35. Refer to your response to Presiding Officer's Information Request No. 1, question 8. Please provide the average number of post office boxes installed in contract offices administered by non-city delivery offices.

OCA/USPS-T4-36. Refer to LR-SSR-119, at page 5. Please provide the average rental cost per square foot for Delivery Group III.

OCA/USPS-T4-37. Refer to your responses to OCA/USPS-T4-10-11 and LR-SSR-119. Please confirm that the sheet entitled "CRA" in LR-SSR-119 was used in the calculation of post office box attributable costs. If you do not confirm, please explain.

Docket No. MC96-3

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.



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August 2, 1996