

ORIGINAL

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-T3-4-6)

The United States Postal Service hereby provides responses of witness Landwehr to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T3-4-6, filed on July 22, 1996.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

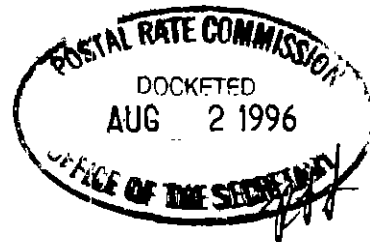
By its attorneys:

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August 2, 1996



OCA/USPS-T3-4. Please describe the general process for assigning boxes to customers. For example, suppose that a new box section is opened with 200 size 1 boxes, numbered 1001-1200.

- a. Are new box holders assigned boxes in some sequential order? For example, would the postmaster assign box 1001, then 1002, then 1003 to the first 3 applicants?
- b. Suppose that this new box section has 20 box holders (and 180 unrented boxes). Are there any processing advantages to the postmaster to assign the boxes 1001-1020 as opposed to sprinkling these 20 box holders in no particular pattern among the available boxes? Please explain.
- c. If only boxes 1001-1020 are rented, and the boxholder for box 1005 moves (leaving a forwarding address), then is the next applicant for a box assigned to 1005, 1021, or just any of the non-rented boxes? Would box 1005 be left unrented for a period of time for forwarding purposes? Please explain.

RESPONSE:

- a. There are no regulations or guidelines for this process. One possibility -- one that I have instructed my employees to use, is to assign post office boxes in sequential order within box size.
- b. A processing advantage can arise from assigning post office boxes in sequential order since clustering of boxes in use facilitates efficient distribution of mail to them.
- c. The box would remain out of service for some period of time (a minimum of ten days in my office) to allow for the forwarding order to take effect. Until that time has passed, a new customer would be assigned the next available box, *i.e.*, 1021. However, after the waiting period box 1005 would be available and could be the next one assigned.

OCA/USPS-T3-5. Refer to page 4, lines 9-11 of your testimony concerning postal customers in Middleburg, VA.

- a. How many postal customers living within the Middleburg corporate limits rely on post office box service?
- b. How many postal customers living within the Middleburg corporate limits rely on general delivery service?
- c. How many postal customers live within the Middleburg corporate limits?

RESPONSE:

Answers to these questions are based upon my discussions with the Middleburg postmaster.

- a. Approximately 675.
- b. Five, a number which has been quite stable over time.
- c. There are an estimated 700 potential delivery points within Middleburg.

OCA/USPS-T3-6. Refer to pages 4-5, lines 19-25 and 1-2, respectively, of your testimony concerning Middleburg, VA post office boxes.

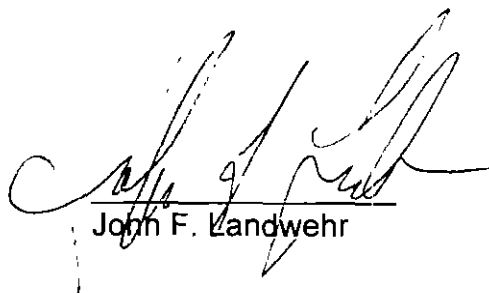
- a. Please explain in detail how and where "mail volumes which exceed box capacity . . . [are] stored separately awaiting pickup."
- b. Please indicate the average length of time mail volumes which exceed box capacity are stored.
- c. Please explain to what alternative uses the space currently allocated to storage would be put in the absence of "between 50 to 60 tubs of mail that must be stored until pickup."
- d. Please indicate whether the 50 to 60 tubs of mail that must be stored until pickup is an average per day, per week, or specify some other time period.
- e. Please define "tub," giving its dimensions, and volume in cubic feet.
- f. Please estimate the volume of mail held by a "tub."

RESPONSE:

- a. Any overflow mail is identified as the mail is worked. It is then placed in flat tubs located on the parcel pick up shelves, in the vicinity of the box section, or on the work room floor for storage.
- b. The Middleburg postmaster estimates an average of two weeks.
- c. Determining how space would be used that is not and has not been available calls for speculation. The Middleburg Post Office is fairly tight on space, so one might expect that the work room floor would be less cluttered thus facilitating all other operations that reach the work room.
- d. The Middleburg postmaster characterizes the 50 to 60 tubs as a daily average.
- e-f. Tub's are the standard white plastic containers designed to hold and transport flat and small parcel mail. Each measures 18" long, 12" wide, and 12" deep and is reported as containing one foot of mail volume.

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.



John F. Landwehr

Dated: 8/2/96

CERTIFICATE OF SERVICE

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.



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