

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
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(OCA/USPS-T5-25)
(August 6, 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



OCA/USPS-T5-25. The following interrogatory refers to your response to OCA/USPS-T5-11.

- a. Exhibit USPS-T-5C at 10 shows a per piece postal card cost of \$0.075. Given that the current post card mailing rate is \$0.20, please confirm that the implicit postal card cost coverage is 266.7 percent ($\$0.20/\0.075). If you are unable to confirm, please explain.
- b. Assume that the Commission approves the additional \$0.02 postal card fee. Please confirm that the implicit postal card cost coverage excluding the postal card fee of \$0.02 is 316.2 percent ($\$0.20/(\$0.075-\$0.01175)$). See also USPS-T-8 at 107. If you are unable to confirm, please explain.
- c. Refer to exhibit USPS-T-5C at 10. Please confirm that the implicit single post card cost coverage is 126.5 percent ($\$0.205/\0.162). If you are unable to confirm, please explain.
- d. Please confirm that in Docket No. R94-1, the Commission recommended a postal card subclass cost coverage of 136.7 percent. PRC Op. R94-1. para. 5103. If you are unable to confirm, please explain.
- e. Refer to exhibit USPS-T-5C at 10. Given that the implicit cost coverage for single post cards is 126.5 percent

(\$0.205/\$0.162) as opposed to 262.7 percent (\$0.197/\$0.075) for postal cards, please explain the rationale for leaving single post cards cost coverage below the Commission's R94-1 recommendation, while increasing that of postal cards.

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
August 6, 1996