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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 SUSAN W. NEEDHAM
(OCA/USPS-T7-39-43)
(August 12, 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

Ernest Rand Costich
SHELLEY DREIFUSS for
Attorney



OCA/USPS-T7-39. Refer to your response to OCA/USPS-T7-22.

- a. Please confirm that the Postal Service does not need an increase in post office box fees in order to decide to "expand box service where appropriate." If you do not confirm, please explain.
- b. Please explain the purpose of fee increases for post office boxes if the resulting revenues are not dedicated to expansion of box service.

OCA/USPS-T7-40. Refer to your response to OCA/USPS-T7-23(b).

- a. If there is "no financial incentive to limit box availability," why didn't the Postal Service propose higher fees than it presented in this proceeding?
- b. If box service is a "high demand service," please confirm that raising fees higher than those proposed will shorten waiting lists and obviate the need for more post office boxes. If you do not confirm, please explain fully.

OCA/USPS-T7-41. Refer to page 7, lines 4-7, of your testimony.

- a. Please describe the type of communities (i.e., cities, suburbs, unincorporated towns and villages, etc.) that are served by Delivery Group I-C post offices.

- b. Please describe the type of communities (i.e., cities, suburbs, unincorporated towns and villages, etc.) that are served by Delivery Group II post offices.

OCA/USPS-T7-42. Refer to pages 34-40 of your testimony. In proposing increased fees for post office boxes, please explain what consideration was given to the fact that mail destined for boxes does not incur delivery costs?

OCA/USPS-T7-43. Refer to pages 34-40 of your testimony. Do you believe that it would fair and equitable to provide a discount to post office box holders because box holders permit the Postal Service to avoid carrier delivery? Please explain.

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 *for*
Attorney

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