BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL ALEXAMMISSION OFFICE L. LE 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—10-12)

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--10-12, filed on July 30, 1996.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083; Fax –5402 August 12, 1996

AUG 1.2 1996

OCA/USPS-T3-10. Your testimony at 5 discusses post office box service in San Luis, AZ.

- a. What measures does the Postal Service currently follow in San Luis, AZ, to verify the accuracy of the data on PS Form 1093, Application for Post Office Box or Caller Service?
- b. Please confirm that an Arizona driver's license may have either a physical street address or a post office box address on the face of the license. If you are unable to confirm, please explain.
- c. Please confirm that AZ residency is not a requirement for the issuance of a valid AZ driver's license or identification card. If you are unable to confirm, please explain.

RESPONSE:

- a. The San Luis Post Office informs me that they use state drivers' licenses, military identification, utility bills, and carrier verification to verify the accuracy of the data on the PS Form 1093.
- b-c. Unable to confirm. I have no knowledge of the requirements and policies underlying Arizona drivers' licenses.

Responses of Witness Landwehr to Interrogatories OCA/USPS-T3-10-12

OCA/USPS-T3-11. Your testimony at 3 discusses the Middleburg, VA Post Office.

- a. Please confirm that VA residency is required in order to obtain a VA identification card or state drivers license. If you are unable to confirm, please explain.
- b. Please confirm that a post office box address on a VA drivers license or state identification card is prohibited except where the population is less than 10,000 and the physical address designation is a post office box or rural route address. If you are unable to confirm, please explain.

RESPONSE:

a-b. Unable to confirm. I have no knowledge of Virginia's driver license and identification card requirements and policies.

Responses of Witness Landwehr to Interrogatories OCA/USPS-T3-10-12

OCA/USPS-T3-1(a) and OCA/USPS-T3-2(a).

- a. Please provide a copy of Postal Service form PS 1093.
- b. Please confirm that the box application requires a box holder to provide a physical address. If you do not confirm, please explain.
- c. Assuming the Commission recommends the proposed changes for post office boxes, what changes are proposed for the box application so as to reflect residence status?

RESPONSE:

- a. A copy of PS Form 1093 is attached to these Responses.
- b. Confirmed. See block 5 of the PS Form 1093 in which the box applicant is required to provide his or her address including street address, city, state, and ZIP Code.
- c. I do not know. My testimony focuses on the current rules for operating and managing post office boxes, not what might happen in the future. In any event, I am informed that any changes required for any implementation of the results of the Special Services Reform case have not been finalized.

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: 8/12/96

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.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 August 12, 1996