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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(APWU/USPS-T5-1-2)
(August 12, 1996)

Pursuant to sections 25 and 26 of the Rules of the Practice of the Postal Rate Commission, the American Postal Workers Union, AFL-CIO, hereby submits the following interrogatories and requests for production of documents.

AMERICAN POSTAL WORKERS UNION, AFL-CIO

By

Susan L. Catler
Susan L. Catler

O'Donnell, Schwartz & Anderson, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the following document upon all participants of record in this proceeding in accordance with the rules of practice.

Washington, D.C. 20005-4126
August 12, 1996

Susan L. Catler
POSTAL RATE COMMISSION
DOCKETED
AUG 13 1996
OFFICE OF THE SECRETARY

APWU/USPS-T5-1 On page 10 and 11 of your testimony you indicate that

The final set of changes involves Special Delivery in Segment 9, Remote Barcode Center Sorting (RBCS) mail processing costs in Segment 3, and the factors used to develop space-related costs. The assignment of costs to Special Delivery Messengers was modified in the Fiscal Year 1995 CRA such that clerks and carriers working in MODS operations 614 and 744 were assigned to Segment 9 from Segments 3, 6, and 7. Also, tallies for Special Delivery Messengers in MODS offices not working in those operations were assigned to Segments 6 and 7. . . .

a. Please explain your rationale for the assignment of costs of clerks and carriers working in MODS operations 614 and 744 from segments 3, 6, and 7 to segment 9.

b. Please explain your rationale for the assignment of costs of Special Delivery Messengers working in offices not working MODS operations 614 and 744 to Segments 6 and 7.

c. Please explain what impact these two changes each had on attributable cost.

d. When would a clerk or carrier be placed in MODS 614 or 744?

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APWU/USPS-T5-2 In your exhibit 5A in Cost Segment 13, you indicate that miscellaneous operating costs include Segment 13.2, Carfare and Driveout in connection with Express Mail. How are these costs incurred and how are they attributed to Express Mail?