

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 LYONS TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM THE POSTAL SERVICE
(OCA/USPS-10-12)

The United States Postal Service hereby provides responses of witness Lyons to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-10 to 12, filed on July 31, 1996, and redirected from the Postal Service.

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

David H. Rubin

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August 14, 1996

POSTAL RATE COMMISSION
AUG 14 1996
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**RESPONSE OF POSTAL SERVICE WITNESS LYONS
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
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OCA/USPS-10. The Request in Docket No. MC96-3, at 1, refers to “changes to the rates for the classes and subclasses of mail” and to “the fees for other special services not specifically addressed by the proposals” that are “planned to be addressed in later Requests.”

- a. List separately each contemplated change in the rates for classes and subclasses that is “planned to be addressed in later Requests.” Describe the nature and extent of the contemplated change and a range of likely dates for the filing of each such Request.
- b. List separately each contemplated change in the fees for special services not yet “addressed” that is “planned to be addressed in later Requests.” Describe the nature and extent of the contemplated change and a range of likely dates for the filing of each such Request.
- c. List separately each special service not requiring “significant reform” and state the basis for the conclusion that reform is not needed.

RESPONSE:

- a. & b. Please see my responses to OCA/USPS-T1-17 and 18.
- c. There has been no determination that any particular special service does not need significant reform.

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OCA/USPS-11. Page 3 of the Request contains the statement: "This filing is unusual in that it would have the effect of increasing net revenue for the Postal Service, outside of an omnibus proceeding." Please state all policy reasons to support the conclusion that it is desirable to increase net revenue outside of an omnibus proceeding.

RESPONSE:

Please see my testimony, USPS-T-1, at page 3, lines 3-11; page 6, line 9 to page 7, line 8; and pages 9-11.

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OCA/USPS-12. Please refer to the statement contained in the Request at 3: "The Postal Service does not wish to maintain products which can currently be improved, while it waits until an omnibus proceeding"

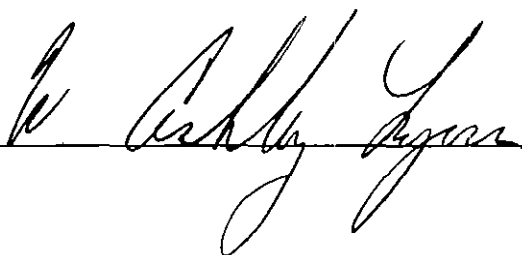
- a. As this conclusion does not reasonably seem subject to dispute, what is the point to be made by the statement? Please explain in full.
- b. Who would be likely to insist that product improvement be restricted to omnibus proceedings? Please explain in full.
- c. Is the point of this statement that the Postal Service should be permitted to increase net revenues without waiting for an omnibus rate case? Please explain in full.

RESPONSE:

- a. The Postal Service is always pleased when statements in its Request are not disputed. The purpose of the statement was to help explain the timing of Docket No. MC96-3. See parts b and c.
- b. I do not know.
- c. The statement speaks for itself. I believe that the Postal Service should be able to request reforms that include an increase in net revenues outside of an omnibus rate case.

DECLARATION

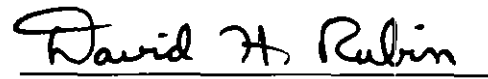
I, W. Ashley Lyons, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 8-13-95

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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