

ORIGINAL

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 NEEDHAM TO INTERROGATORIES OF
THE NATIONAL ASSOCIATION OF POSTMASTERS OF THE U.S.
REDIRECTED FROM WITNESSES LYONS, STEIDTMANN, AND LION
(NAPUS/USPS-T1-4; T2-1, 2, AND 4; AND T4-3)

The United States Postal Service hereby provides responses of witness Needham to the following interrogatories of the National Association of Postmasters of the U.S.: NAPUS/USPS-T1-4, filed on July 31, 1996, and redirected from witness Lyons, NAPUS/USPS-T2-1, 2, and 4, filed on July 31, 1996, and redirected from witness Steidtmann, and NAPUS/USPS-T4-3, filed on July 31, 1996, and redirected from witness Lion.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

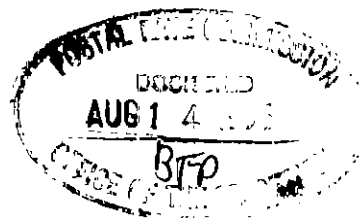
By its attorneys:

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August 14, 1996



RESPONSE OF U.S. POSTAL SERVICE WITNESS NEEDHAM TO
INTERROGATORIES OF THE NATIONAL ASSOCIATION OF POSTMASTERS
OF THE UNITED STATES
(REDIRECTED FROM WITNESS LYONS)

NAPUS/USPS-T1-4. If box rents are increased at the rate proposed in MC96-3, what is the average percentage increase in box rents which a boxholder would have seen since 1990? Please confirm that your average includes the increases resulting from R90, R94 and the 1995 Reclassification proceeding.

RESPONSE:

The average percentage increase in box fees (including caller service fees) from 1990 through the proposal in Docket No. MC96-3 is 68 percent. This includes the increases resulting from Dockets No. R90-1 and R94-1; Docket No. MC95-1 did not increase fees.

**RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM TO INTERROGATORIES
OF NATIONAL ASSOCIATION OF POSTMASTER OF THE UNITED STATES
(REDIRECTED FROM WITNESS STEIDTMANN)**

NAPUS-T2-1. Please refer to your testimony at page 4. How will the Postal Service define "resident"?

- a) Does a person who rents but does not own property qualify?
- b) Do snowbirds who live in the North during the summer but have a winter home in the South or Southwest "reside" in one or both communities?
- c) What is the residence status of individuals who spend some period of time annually at a resort or time share community?

RESPONSE:

A detailed definition of "resident" will be determined as part of the implementation process. However, I expect that the implementation of a non-resident fee would be consistent with the following answers.

- a) Renters would qualify to the same extent as owners.
- b) Customers, including "snowbirds", might have more than one residence, but implementing regulations would determine whether a particular "snowbird" qualifies as a resident in two places.
- c) Vacationers, whether at resorts, time-share communities, or hotels, are rarely in residence long enough or continually over time to be interested in box service. They typically receive mail as part of a single centralized delivery to the host facility, which then sorts the mail to its occupants. If necessary, implementing regulations may provide further guidance on the residence status of such individuals.

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NAPUS/USPS-T2-2. Please list all documents which would be acceptable proof of resident? Would the postmaster be required to copy or otherwise document that he or she had been shown proof of residence?

RESPONSE:

Please see my testimony USPS-T-7, page 24, lines 2-11, which gives examples of acceptable proof of residency. There are probably other verifiable proofs of residency that I have not listed that may be unique to a community, town, state, or region of the country. Therefore, I cannot list all documents which would be acceptable proof of residency. The requirements for postal employees when considering proof of residency will be determined as part of the implementation process.

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NAPUS/USPS-T2-4. In offices where a sufficient number of boxes are not available, people often receive mail by General Delivery. Please confirm that those people would only be able to pick up their mail during hours when counter service was open.

RESPONSE:

Confirmed.

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(REDIRECTED FROM WITNESS LION)

NAPUS/USPS-T4-3. By level of office, what is the average time of day that First-Class and Priority mail are placed in the boxes.

RESPONSE:

Please see my response to OCA/USPS-T7-20(a)

DECLARATION

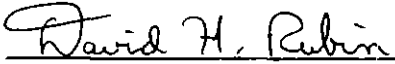
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: August 14, 1996

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.



David H. Rubin

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