

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 LION TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T4-41-43)

The United States Postal Service hereby provides responses of witness Lion to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-41-43, filed on August 6, 1996. Interrogatories OCA/USPS-T4-38-40 were redirected to the Postal Service.

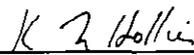
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Kenneth N. Hollies

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August 20, 1996



**OCA/USPS-T4-41.** Refer to Table 18 of your testimony concerning the attributable costs of post office boxes. Please confirm that the cost of parcel lockers is included in the total attributable costs per box.

(a) If you do not confirm, please explain the rationale for excluding the cost of parcel lockers from attributable costs.

(b) If you do confirm, please explain where and how the cost of parcel lockers has been included in attributable costs.

RESPONSE:

a-b. Confirmed. Space required for parcel lockers is included directly with post office boxes, as shown at page C-15 of LR-G-120 in Docket No. R94-1. Labor costs are included in the "All Other" category.

**OCA/USPS-T4-42.** Refer to Table 4 of your testimony concerning the number of post offices boxes in use. Please provide the number of post office box customers that also receive city, rural, or highway contract delivery service by Delivery Group I-A, I-B and I-C, and Delivery Group II.

RESPONSE:

We have no information on the number of boxholders that also receive delivery service.

**OCA/USPS-T4-43.** Refer to Table 7 of your testimony concerning facilities reporting space to expand.

- (a) Please provide the number of post offices reporting that the number of boxes in use for each box size equaled the number of boxes installed for each box size by Delivery Group I-A, I-B and I-C, and Delivery Group II.
- (b) Please provide the number of post offices identified in “a” above that also reported space available to expand the number of post office boxes by Delivery Group I-A, I-B and I-C, and Delivery Group II.

RESPONSE:

(a) This information is given in Table 6, page 9 of USPS-T-4.

(b)

**Post Offices with In Use = Installed and Space Available**

Delivery Group	Box Size				
	1	2	3	4	5
I-A	0	0	2	0	0
I-B	4	8	5	4	2
I-C	207	176	185	235	205
II	674	1096	1881	770	246

[Note: The row totals, if added, will be larger than those shown in column 5 of Table 7, page 10, USPS-T-4. These rows are not additive. Facilities with in use=installed in more than one box size will be double-counted.]

DECLARATION

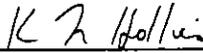
I, Paul M. Lion, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
Paul M. Lion

Dated: 8/20/96

**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

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