

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
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T4-38-40)

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

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

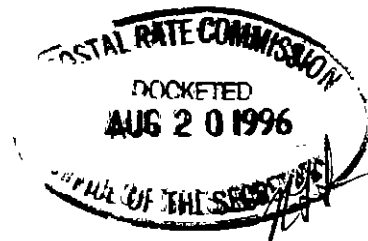
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
August 20, 1996



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OCA/USPS-T4-38. Refer to LR-SSR-104, Exhibit II, and column "Form 1901's Volumes." Please confirm that the figure 8,577 represents the total number of separations.

- a. If you do not confirm, please explain in detail what this figure represents.
- b. If you do confirm, please reconcile this figure with the 233,786 "Caller Numbers or Separations," on page 1 of LR-SSR-104.

RESPONSE:

Confirmed, as explained below.

- a. This represents the total number of separations at the 117 post offices studied in the approximately one-month-long data collection for the original caller service cost study. See Docket No. R80-1, Library Reference C-5, pages 2-4, and 11.
- b. The total number of separations on page 1 of LR-SSR-104 (100,770, as revised August 7, 1996) represents the total number of separations based on witness Lion's FY 1996 data collection (LR-SSR-113).

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OCA/USPS-T4-39. Refer to LR-SSR-104, page 1. Please confirm that the figure 233,786, "Total Number of Separations," was derived by multiplying the total number of firms (100,700) by the "Separations per Caller" (2.32).

- a. If you do not confirm, please explain.
- b. If you do confirm, please provide a count of call numbers (not firms) or, in the alternative, a list of call numbers assigned.

RESPONSE:

Not confirmed.

- a & b. As revised on August 7, 1996, the "total number of separations" on page 1 of LR-SSR-104 is 100,770, based directly on witness Lion's data collection (LR-SSR-113). The total number of separations is equivalent to the count of call numbers.

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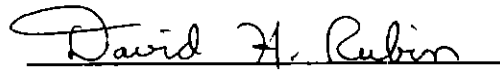
OCA/USPS-T4-40. Refer to LR-SSR-104, Exhibit IV. Please provide all data and calculations used to derive the figure 4.1, the "Number of Square Feet Allocated per Firm".

RESPONSE:

This figure is based on the results of the data collection described in Library Reference C-5. See pages 5 and 14. The raw data and calculations are no longer available.

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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