

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS TO INTERROGATORY OF
THE NEWSPAPER ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS STEIDTMANN
(NAA/USPS-T2-1)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Newspaper Association of America: NAA/USPS-T2-1, filed on August 7, 1996, and redirected from witness Steidtmann.


The 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


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
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(202) 268-2990; Fax -5402
August 21, 1996

POSTAL RATE COMMISSION
DOCKETED
AUG 21 1996
OFFICE OF THE SECRETARY

Answer of Richard Patelunas to the Interrogatories of
Newspaper Association of America
to United States Postal Service
(Redirected from witness Steidtmann USPS-T-2)

NAA/USPS-T2-1.

At page 1, lines 16-18 of your testimony, you state that "Special services, and postal products in general, face different cost, market, and competitive considerations. For example, within special services, the competition and market for post office boxes differ from those for services such as special delivery mail."

a) Has the Postal Service advertised its post office box services?

b) Has the Postal Service advertised any other service that faces similar competition by private service providers in the market place?

c) If your answer to either part a or part b is yes, please provide data reflecting the amount the Postal Service spent on advertising in the most recent fiscal year for which data is available. Please provide a citation for the advertising sum in the current filing and/or library references.

NAA/USPS-T2-1 Response:

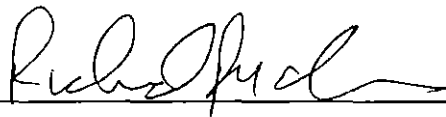
a) No, the Postal Service has not reported any advertising for post office box services in its Cost Segments and Components report since at least Fiscal Year 1986. I did not research this any further because I have no reason to suspect that the years prior to FY 1986 would be any different.

b) If the phrase "any other service" means any of the classes or subclasses of mail, or special services, the answer is yes.

c) Fiscal Year 1995 is the most recent year for which data are available. For FY 1995 advertising expenditures, please see USPS-T-5 Exhibit 5A, page 51, component (16.3.5), entitled "Advertising".

DECLARATION

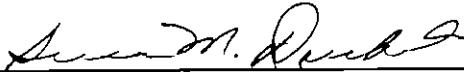
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.



Dated: 8-21-96

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.


Susan M. Duchek
Susan M. Duchek

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