

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 LANDWEHR TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T4-44b-c)

The United States Postal Service hereby provides the response of witness Landwehr to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T4-44b-c, filed on August 9, 1996, and redirected from witness Lion.

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



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
August 22, 1996

POSTAL RATE COMMISSION
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OCA/USPS-T4-44. Refer to LR-SSR-113, page 4, and the response to OCA/USPS-T4-23.

a. Please confirm that the "P.O. Box Unit Survey" instructions requested that reporting facilities "[r]eport the total number of caller service customers" If you do not confirm, please explain.

b. What evidence do you have that "unit managers" responding to the line, "Caller Service: Number of Customers" in the survey referred to in (a) above were providing a count of the "caller numbers that are assigned to the callers . . . for each separation used"? (See Response to OCA/USPS-T4-23; DMM § D920.1.4.)

c. What evidence do you have that "unit managers" responding to the line "Caller Service: Number of Customers" in the survey referred to in (a) above were providing a count of the "number of persons or organizations receiving caller service"? (See Response to OCA/USPS-T4-23; DMM § D920.1.2.)

c[sic]. Please provide any additional instructions to "unit managers" responding to the survey referred to in (a) above concerning the data requested for "Caller Service: Number of Customers."

RESPONSE:

Only subparts b and c of this interrogatory were re-directed to Witness Landwehr.

b-c. The P O Box Survey that asked for "Caller Service: Number of Customers" in USPS LR-SSR-113, page 4, would be most likely interpreted by responding postmasters as requesting the total number of separations. Workload impact and work hour requirements for distribution in post office box units are based on volumes and number of separations, not the number of individuals or businesses requesting those separations. For example, a post office may have a business customer that uses ten different caller service separations for ten different departments. The work load impact is based on the volume and number of separations, regardless of the actual number of customers underlying those separations.

OCA/USPS-T4-45. Refer to LR-SSR-113, page 4, and the response to OCA/USPS-T4-23. Suppose that an office has three caller service customers and a total of six caller service numbers or separations. Suppose also that the “unit manager” mistakenly enters “6” for the total number of caller service customers in the “P.O. Box Unit Survey.”

a. Please confirm that such an error would not be detected in your edit process of data from the “P.O. Box Unit Survey.”

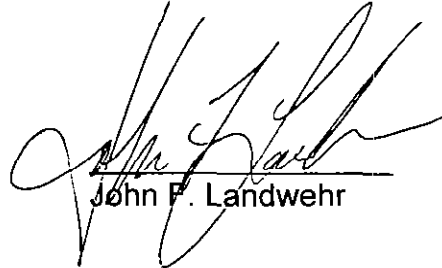
b. If you do not confirm, please explain what source of additional data was relied on to identify the “6” as being incorrect.

RESPONSE:

“Six” would not be an incorrect answer. See my response to OCA/USPS-T4-44b-c.

DECLARATION

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



John F. Landwehr

Dated: 8/22/96

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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