### 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 PATELUNAS TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM THE POSTAL SERVICE (OCA/USPS-13)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-13, filed on August 1, 1996, and redirected from the Postal Service. The response originally was due on August 15, 1996, but an extension of time for responding was granted. *Presiding Officer's Ruling Granting Motions for Extensions of Time to Respond, August 19, 1996*.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

n. Duck

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990; Fax –5402 August 22, 1996



# Answer of Richard Patelunas to the Interrogatories of Office of the Consumer Advocate to United States Postal Service

#### OCA/USPS-13.

Please refer to witness Patelunas' response to OCA/USPS-T5-4. Witness Patelunas states that there have been no processing or delivery changes what would account for the large decline in unit attributable costs.

- a) What else could have caused the decrease in unit attributable costs?
- b) Please explain why a large increase in the volume of certified mail would only cause a small decrease in attributable costs.
- c) Please provide a table, with dollar amounts, detailing the cost components or activity codes that show the decline in unit attributable costs.
- d) With regard to the unit cost items that have exhibited a significant change, please provide an explanation for the change.

### OCA/USPS-13 Response:

a. Nearly forty percent of the 17.6% decline in Certified unit cost discussed in OCA/USPS-T5-4 results from a Revenue, Pieces and Weight report (RPW) reporting change. The Cost and Revenue Analysis report (CRA) showed a FY 1994 certified unit cost of 118.2 cents and the FY 1995 CRA showed a certified unit cost of 97.4 cents. Thus, the total unit cost change was 20.8 cents or 17.6%.

The RPW reporting change was for transaction revenues, and hence volumes, associated with return receipts for merchandise. Beginning in

# Answer of Richard Patelunas to the Interrogatories of Office of the Consumer Advocate to United States Postal Service

OCA/USPS-13 Response continued:

FY 1995, the volumes for return receipts for merchandise were included in with Certified Mail. For FY 1995, return receipts for merchandise volume was 22,395,409 and total Certified volume including these return receipts was 288,826,806. Had the return receipts for merchandise not been included, which would be comparable to FY 1994, the Certified volume would have been 266,431,397. Using Certified volume without the merchandise return receipt volume as the denominator yields a unit cost of 105.6 cents. The difference between the FY 1995 Certified unit cost in the CRA of 97.4 cents and the 105.6 cents is 8.2 cents. Thus, of the 20.8 cents per piece change between the FY 1994 CRA and the FY 1995 CRA, 8.2 cents per piece, or 39.4%, is the result of the RPW reporting change.

- b. The large increase in the volume of certified mail did not cause a small decrease in attributable costs. Attributable costs in FY 1994 were \$277.4 million and in FY 1995 they were \$281.4 million.
- c. See Attachment I that accompanies this response for a complete detail of all cost component changes for Certified Mail between FY 1994 and FY 1995.

# Answer of Richard Patelunas to the Interrogatories of Office of the Consumer Advocate to United States Postal Service

#### OCA/USPS-13 Response continued:

d. If significant change is defined as a change greater than 10%,
Attachment I shows changes for the following components:

(3.1) Mail Processing Direct Labor	-10.6% of total
(3.2) Window Service	-12.3% of total
(7.3) Elemental Load	-21.0% of total
(10.1) Evaluated Routes	-11.6% of total
(18.3.2) Civil Service Retirement	-17.2% of total
(20.5) Interest Expense	+14.5% of total

The Civil Service Retirement and the Interest Expense, and to a lesser extent the changes in Segment 16 (see Attachment I), are the result of account and component changes instituted for the FY 1995 CRA. I discussed these changes and provided an overall attribution change in my response to UPS/USPS-T5-3. As for the other changes involving mail processing, window service and delivery operations, there is no simple, obvious explanation. Inquiries to operations personnel resulted in no additional information to help understand the change in Certified unit cost. I also checked with data systems personnel who conducted detailed examinations of the costing systems and nothing was discovered to account for the change in Certified unit cost.

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(8)	(7)	(9)	( <u>c</u> )	(4)	(5)	(z)	(t)				
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M. Total	/√ change 7/	Nifference 6√	/G 661 Y∃	FY 1994 4/	V€ eonereñiQ	12 966 사	// P66/ Y7				YAAMMUS

#### **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.

Ruldful

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.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 August 22, 1996