

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 LYONS TO INTERROGATORY OF
DAVID B. POPKIN
(DBP/USPS-T1-12)

The United States Postal Service hereby provides the response of witness Lyons to the following interrogatory of David B. Popkin: DBP/USPS-T1-12, filed on August 9, 1996. Interrogatories DBP/USPS-T1-1-11 were redirected to witness Needham.

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

Respectfully submitted,

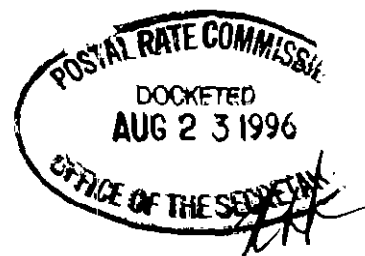
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
August 23, 1996



RESPONSE OF WITNESS LYONS TO
INTERROGATORIES OF DAVID B. POPKIN

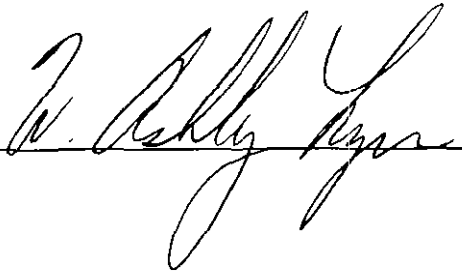
DBP/USPS-T1-12. On page 17 of your testimony you indicate that there are three certified mail transactions per US household. Is this meant to show that certified mail is utilized equally by all households. If not, please explain the significance of your statement.

RESPONSE:

No. As stated on page 17 line 5 of my testimony “the fee increases need to be placed in perspective”. The fact that the each US household averages no more than three certified transactions per year was intended to show the minimal impact of the proposed certified fee increase on a typical household. In a hypothetical scenario in which a typical household is assumed to be responsible for an average of three transactions per year, the impact per household is only \$2.40 or .005 percent of personal income. These averages are actually somewhat lower since some certified transactions are made by businesses.

DECLARATION

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

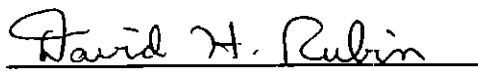


A handwritten signature in cursive script, appearing to read "W. Ashley Lyons", is written over a horizontal line.

Dated: 8-23-96

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.


David H. Rubin

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