

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 INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T4-46)

The United States Postal Service hereby provides the response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T4-46, filed on August 9, 1996, and redirected from witness lion.


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

Respectfully submitted,

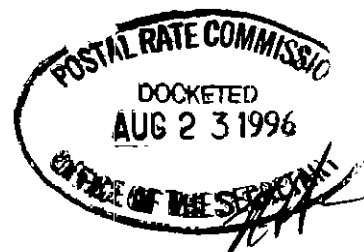
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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 THE POSTAL SERVICE TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(REDIRECTED FROM WITNESS LION)**

OCA/USPS-T4-46. Refer to LR-SSR-104, page 1, as revised August 7, 1996.

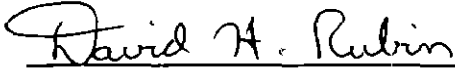
- a. Please provide the "Total Number of Firms or Callers" and the "Total Number of Separations" for the years 1989 to 1995, inclusive.
- b. Please explain the reasons for any decline in the number of callers and/or separations during this period.

RESPONSE:

- a. These numbers have been determined only for omnibus rate cases. For Docket No. R90-1, library reference F-180 contains the equivalent of the caller service cost study update in LR-SSR-104, and reports 52,028 firms and 120,705 separations. See LR-F-180, Caller Service update, pages 11, 14. For Docket No. R94-1, these numbers were not updated, so the same numbers were used, except that 120,705 was changed to 120,706. See LR-G-136, page 28.
- b. Not applicable.

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
David H. Rubin

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