

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 LION TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T4-44, PARTS A AND D)

The United States Postal Service hereby provides the response of witness Lion to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T4-44, parts a and d, filed on August 9, 1996. Please note that there were two parts named "c" in interrogatory T4-44, as filed. Witness Lion is responding to the second part "c", which has been renamed part "d". Interrogatories OCA/USPS-T4-44, parts b and c, and 45 were redirected to witness Landwehr, and interrogatory 46 was redirected to the Postal Service.

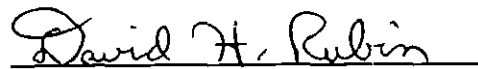
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

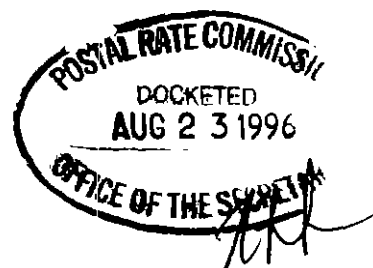
UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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August 23, 1996



**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:

Subparts b and c of this interrogatory are being answered by Witness Landwehr.

a. Confirmed.

[d.] No additional instructions were provided to unit managers.

DECLARATION

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

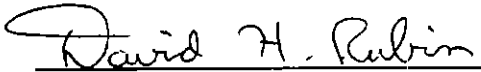


Paul M. Lion

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  
David H. Rubin

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