

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
REDIRECTED FROM WITNESS NEEDHAM
(APWU/USPS-T8-44(A) AND 45)

The United States Postal Service hereby provides responses of witness Patelunas to the following interrogatories of the American Postal Workers Union, AFL-CIO: APWU/USPS-T8-44(a) and 45, filed on August 13, 1996, and redirected from witness Needham.

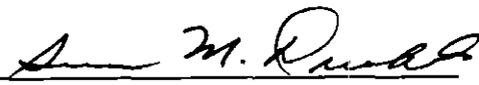
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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August 26, 1996




Answer of Richard Patelunas to the Interrogatories of
American Postal Workers Union
to United States Postal Service
(Redirected from witness Needham USPS-T-8)

APWU/USPS-T8-44

With respect to International "Expres" Mail

a. Explain the process by which the Postal Service attributes costs for Special Delivery Service supplied to International "Expres" mail.

APWU/USPS-T8-44a Response:

a. If the phrase "Special Delivery Service" refers to Cost Segment 9, Special Delivery Messengers, the attribution process is defined in my workpaper USPS-T5, WP B-13. International "Expres" is included in the International Mail row of W/S 9.0.1, page 2. Likewise, it is included in the Foreign Special Delivery row of W/S's 9.0.4 and 9.0.5.

If the phrase "Special Delivery Service" refers to any other segments besides Segment 9, the attributable costs for International "Expres" are included in the total International line.

If the phrase "Special Delivery Service" means the Special Delivery line under Special Services in the Cost and Revenue Analysis report, there are no international costs included.

Answer of Richard Patelunas to the Interrogatories of
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(Redirected from witness Needham USPS-T-8)

APWU/USPS-T8-45

Please provide comparative annual advertising expenditures for 1970 through 1995 for Express Mail, Priority Mail and Special Delivery Service.

APWU/USPS-T8-45 Response:

Listed below are the advertising expenditures for Express Mail, Priority Mail and Special Delivery Service as they appear in the Cost Segments and Components report for the last ten years. I have no reason to suspect that the years prior to FY 1986 would be comparatively different.

	(amounts in thousands)		
	Express Mail	Priority Mail	Special Delivery
1995	12,421	16,179	0
1994	20,200	19,200	0
1993	31,025	23,226	0
1992	23,077	6,421	0
1991	23,964	2,837	0
1990	27,900	0	0
1989	22,500	127	0
1988	24,300	0	0
1987	32,067	0	0
1986	23,416	0	0

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.

Richard Patelunas

Dated: 8-26-96

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
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