BEFORE THE REPOSTAL RATE COMMISSION WASHINGTON, D.C. 20268-000126

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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 MAJOR MAILERS ASSOCIATION (MMA/USPS-T5-1)

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Major Mailers Association: MMA/USPS-T5-1, filed on August 12, 1996.

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

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2990; Fax -5402 August 26, 1996



Answer of Richard Patelunas to the Interrogatories of Major Mailers Association to United States Postal Service

MMA/USPS-T5-1.

Your Exhibit USPS-T-5C shows revenues for each mail class and many subclasses for Fiscal Year 1995. On pages 1 and 16 of that exhibit, you show total revenues for both all Special Services combined and for each individual Special Service (Registry, etc.).

In the same exhibit, however, you do not show total revenues for both First-Class Mail and for each of its subclasses. Instead, on page 1, you show total revenues of \$31,955,100,000 for all of "First-Class Mail." On page 10 of the same exhibit, you show only the revenue per piece for five First-Class subclasses.

Although page 10 of Exhibit USPS-T-5C shows the volumes for total First-Class Mail and each of the five subclasses, it is not possible to derive accurate revenues for each of the subclasses because the per piece revenue figures are rounded only to the nearest tenth of a cent.

Please provide information showing the break-down of the \$31,955,100,000 total First-Class Mail revenues (shown on page 1 of the exhibit) for each of the five First-Class subclasses shown on page 10.

MMA/USPS-T5-1 Response:

For the First-Class Mail break-down that you have requested, please see my workpaper WP-A, page 129, column (1) or my workpaper WP-B, W/S 1.1.1, page 1 of 2.

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.

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Dated: 8-26-93

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 26, 1996