

ORIGINAL

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

RECEIVED
SEP 4 4 31 PM '96
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

SUPPLEMENTARY RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS NEEDHAM TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T7-38)

The United States Postal Service hereby provides the supplementary response of witness Needham to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T7-38, filed on August 6, 1996. The original response was filed on August 20, 1996.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

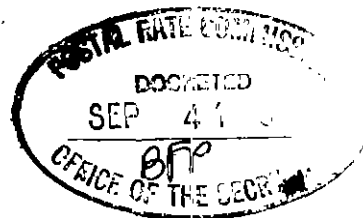
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
September 4, 1996



**SUPPLEMENTAL RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T7-38. Refer to your response to interrogatory OCA/USPS-T7-15(a), where you state that the Postal Service "is unable to identify all offices in which management has complained to supervisors regarding the problems caused by non-resident box holders." Other than the postal facilities discussed in the testimony of witnesses in this proceeding, please identify any postal facilities where there have been complaints concerning non-resident box holders. Please provide supporting details.

SUPPLEMENTAL RESPONSE:

This supplies additional information regarding offices that are understood by postal management to face challenges in serving non-resident boxholders.

Brookings, Oregon, borders California and is popular among California residents who want an Oregon address for vehicle registration purposes. The Canyon City, Oregon Post Office, and the Battleground and Amboy Post Offices in Washington are popular among non-residents because these Group II offices offer lower fees than surrounding Group IC offices.

Post offices in the California cities of Malibu, San Ysidro, and Lincoln, have high proportions of non-resident boxholders and the associated box mail accumulation problems resulting from infrequent box mail pickups. Similarly, the Woodbridge, California; Steamboat Springs, Colorado; Friday Harbor, Washington; Lynden, Washington; Stanwood, Washington; Oroville, Washington; and South Cle Elum, Washington Post Offices have high proportions of non-resident boxholders and no available boxes for residents.

**SUPPLEMENTAL RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T7-38

Page 2 of 2

Approximately half of the boxholders in the Santa Monica and Sunset Beach Post Offices in California are non-residents. Santa Monica appears to be a prestige address and the office has a waiting list. Non-residents appear to choose box service in Sunset Beach as a matter of convenience. Post offices in the California cities of Universal City, Studio City, Toluca Lake, and Burbank are also understood to have substantial non-resident boxholders and their concomitant operational challenges.

Non-resident boxholders at three additional Arizona post offices are understood to make up a substantial portion, if not a majority, of all boxholders. The Sahuarita and Lukeville Post Offices are Mexican border towns, while the Lakeside Post Office is in a resort area.

DECLARATION

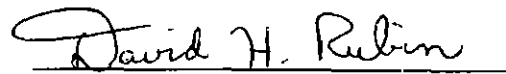
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: September 4, 1996

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 4, 1996