## BEFORE THE RECEIVED POSTAL RATE COMMISSION WASHINGTON, D.C. 20268 0001 4 34 PH 96

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
RE-DIRECTED FROM WITNESS LION
(OCA/USPS-T4-48a-c AND 48e-f)

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-48a-c and 48e-f, filed on August 28, 1996, re-directed from witness Lion.

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

Kenneth N. Hollies

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Responses of the USPS to Interrogatories of the Office of the Consumer Advocate, Re-directed from Witness Lion, MC96-3

## OCA/USPS-T4-48. Please refer to your response to DFC/USPS-T4-1.

- a. Does the Postal Service have data on a nationwide or regional basis indicating hours of operation of post offices? What are the data?
- b. If the Postal Service has summary data on this subject, please provide the data.
- c. To what extent is access to post office boxes dependent on the hours a post office provides retail services? Please explain.
- d. [Not re-directed.]
- e. To what extent do post office box holders have access to post office boxes less than twenty-four hours a day but more than the normal hours of operation of a postal facility? Please explain.
- f. On average, is there any difference in access to post office boxes depending on whether the postal facility is an urban facility, a suburban facility or a rural facility? If there is a difference, please explain the causes and magnitude of the difference. Please provide data to the extent available.

## RESPONSE:

- a. The Postal Service has no reliable nationwide or regional data indicating hours of operation.
- b. No summary data are available.
- c. In many offices, particularly small ones, the posted hours of operation determine access to post office box section and vending equipment, as well as the retail counter.

  When such offices are closed, so is access to all services. However, many post offices provide access to a separate post office box section and vending equipment lobby after the doors to the retail lobby are locked. Access to these separate box section areas can often be extended to twenty four hours per day.

We are not aware of any hard and fast criteria linking retail hours of operation to box section access. Consideration is typically given to crime (in the immediate area of post office), safety (of customers), security and vandalism.

e. The Postal Service does not track post office box lobby hours so there is no means of quantifying the extent to which box customers have access to boxes for less than

Responses of the USPS to Interrogatories of the Office of the Consumer Advocate, Re-directed from Witness Lion, MC96-3 twenty four but more than the retail hours of operation. The criteria identified in response to OCA/USPS-T4-48(c), such as vandalism in a box section, would be one reason why a box section could be open longer than retail operations, yet less than twenty four hours.

f. The postal service has no national policy or standards regarding lobby hours of operation. These decisions are made at the local level. We are not aware of any patterns that would lead to an expectation that access to box sections differs systematically along lines of urban, suburban and rural locations, although we have no data that would permit direct examination of this question. Customer convenience and security are factors used in determining extended lobby hours.

## **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.

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 September 6, 1996