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

SEP 6 4 34 PH '96 1 POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF NASHUA/MYSTIC (NM/USPS-7) (September 6, 1996)

The United States Postal Service hereby provides the response to the following interrogatory of Nashua/Mystic: NM/USPS-7, filed on August 8, 1996. Objections to interrogatories NM/USPS-8-27 were filed on August 19, 1996. A request for an extension of time until today to respond to NM/USPS-1-7 was filed on August 22, 1996. A second request for extension of time to respond to NM/USPS-1-6 is being filed today.

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 September 6, 1996



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF NASHUA PHOTO INC. AND MYSTIC COLOR LAB

NM/USPS-7.

a. Please confirm that on April 23, 1996, at the National Postal Forum in Anaheim, California, the prepared remarks of William J. Henderson, Chief Operating Officer and Executive Vice President of the United States Postal Service, included the following statement:

In three years, we will see \$9.6 billion of additional expenses. And growth in total costs for the five-year period out to the year 2000 will be in the \$17 billion range....Our current forecasts show a gap of \$12.4 billion.

- b. Please provide a full definition of the "gap" referred to by Mr. Henderson.
- c. Starting with either FY 1996 or FY 1997, indicate on a year by year basis the annual gap forecasted by Mr. Henderson until it reaches the cumulative total of \$12.4 billion.

RESPONSE:

- a. Confirmed.
- b. The gap referred to by Mr. Henderson is the amount by which cumulative net income (equity restoration) for the period FY 94 FY 2000 would fall short of the amount required to meet the targets established by Board of Governors Resolution No. 95-9, Restoration of Equity and Recovery of Prior Years' Losses.
- c. The gap referred to by Mr. Henderson covered the period FY 1994 FY 2000 assuming a continuation of current trends and no rate increases after the one implemented on January 1, 1995. The annual amounts for the period FY 1994 FY 1997 are shown below. Estimates for the Period FY 1998 FY 2000 have not been provided because they are beyond both the test year and the year in which the proposed special services reforms would be implemented.

Net Income (Loss) GAP From Equity Restoration Target (\$millions)

1	2	3	4	5
Fiscal	Actual or	Needed to Meet	Over/(Under)	Cumulative Amt.
Year	Estimate	BOG Target	Target	Over/(Under)
1994	(914)	(1,344)	430	430
1995	1,770	936	834	1,264
1996	923	936	(13)	1,251
1997	(652)	936	(1,588)	(337)

Column 2 - FY 94 & 95 reflect actual results. FY 96 & 97 reflect FY 97 President's Budget estimates.

Column 3 - FY 94 is Docket No. R94-1 estimated net loss for FY 94. FY 95 - 97 amounts reflect average annual Prior Years' Loss amount from Docket No. R94-1 Opinion.

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 September 6, 1996y