

005259 ORIGINAL

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

RECEIVED
SEP 13 4 56 PM '96
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

WRITTEN RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS LYONS TO QUESTIONS POSED DURING HEARINGS

The United States Postal Service hereby provides responses of witness Lyons to questions posed during hearings on Monday, September 9, 1996. Each question is stated 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. 20260-1145
(202) 268-2986; Fax -5402
September 13, 1996

POSTAL RATE COMMISSION
DOCKETED
SEP 13 1996
OFFICE OF THE SECRETARY

RESPONSE OF POSTAL SERVICE WITNESS LYONS
TO QUESTION OF THE OFFICE OF THE CONSUMER ADVOCATE
FROM THE HEARING ON SEPTEMBER 9, 1996

Question (Tr. 2/209): If you have such a list at this time of issues that have to be resolved . . . with regard [to] implementing the non-resident surcharge, could you please furnish it at a later date?

RESPONSE:

A list of issues that have to be resolved with regard to implementing the non-resident fee has not been compiled at this time.

WRITTEN RESPONSE OF POSTAL SERVICE WITNESS LYONS
TO ORAL INQUIRY BY CHAIRMAN GLEIMAN

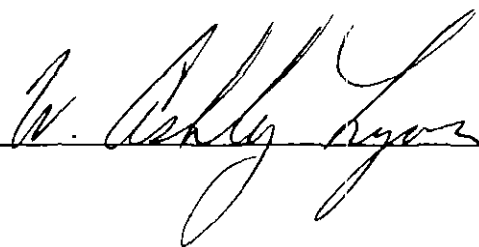
Tr. 2/192-193. At this point in the transcript, the Chairman asked the witness for more information on any changes in the regression analyses for Registered Mail and Certified Mail that might have been introduced between Docket No. R94-1 and the development of the regressions presented in USPS-LR-SSR-135.

RESPONSE:

As I stated at the hearings, it is my understanding that the same basic approach was employed in both instances. I have since verified that my understanding in this regard is correct. I have been further informed, however, that there have been some refinements in the model specifications. The details of those refinements are discussed in USPS-LR-SSR-147.

DECLARATION

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




W. Ashley Lyons

Dated: 9-13-96

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.



David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1145
September 13, 1996