

ORIGINAL
005287

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

RECEIVED

SEP 18 4 38 PM '96

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

UNITED STATES POSTAL SERVICE RESPONSE TO
QUESTION RAISED IN ORAL
CROSS-EXAMINATION OF WITNESS LANDWEHR
(September 18, 1996)

In oral cross-examination of witness Landwehr on September 11, 1996, David Popkin posed a question originally propounded as an interrogatory which the witness was unable to answer. Mr. Popkin accordingly asked that the question be re-directed to the Postal Service and answered as an institutional interrogatory. Tr. 4/1323-24. This document states the question verbatim and provides a response.

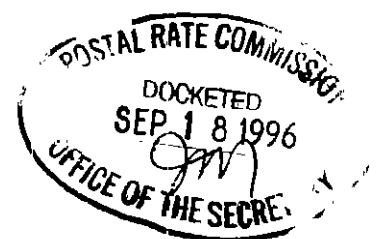
QUESTION:

How many separate postal facilities are there in the United States and possessions that provide post office box service?

RESPONSE:

As Mr. Popkin explained while propounding this question, his purpose is to "compare [witness Landwehr's] evaluations with the total spectrum" of offices. Tr. 4/1323. Moreover, Mr. Popkin stated separately that he was looking for a count of facilities, not just post offices. Tr. 4/1322-23.

Postal counsel indicated in the hearing that this information is publicly available, Tr. 4/1323, but that "I am sure we can provide you something." Tr. 4/1324.



- 2 -

Notwithstanding counsel's blandishments in the hearing, postal officials have been unable to find a direct way of generating the requested number. Counsel's reference to the public availability of this information was to the *National Five-Digit ZIP Code and Post Office Directory*, an annual publication which identifies postal facilities by type.¹ However, it neither aggregates counts of types of postal facilities nor identifies separately those which offer box service.

Witness Lion's post office box study provides additional insight into the answer. Table 2 of USPS-T-3 indicates that a total of 32,436 survey forms were mailed to post offices, and classified stations and branches. Most but probably not all of these offer box service, so in that respect the number is a little high. That total fails, however, to account for contract units with box service, so in that respect the number is too low.

The Postal Service also tried to answer the question through the Delivery Statistics File (DSF), which was relied upon by witness Lion in performing his study and answering interrogatories. The DSF permits separate identification of post offices that do or do not offer box service. Post offices, however, are identified by separate finance numbers. The DSF shows 27,503 finance numbers with post office box service. However, multi-facility offices may offer box service at some subordinate facilities and not others, and the DSF does not permit parsing to this level.

¹Page 3-3 of the 1996 directory lists and defines 11 types of facilities.

- 3 -


In conclusion, an estimate of the actual number of separate facilities offering box service is somewhere in the low to mid thirty thousands. No specific number is available, but given Mr. Popkin's stated purpose in propounding the question, this estimate should meet his needs.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

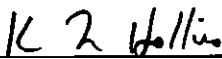
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

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
(202) 268-3083; Fax -5402
September 18, 1996