

**ORIGINAL**

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

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-25(a) AND 37(a) AND (b))  
AND MOTION FOR EXTENSION OF TIME  
(September 23, 1996)

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-25(a), filed on August 9, 1996, and 37(a) and (b), filed on August 14, 1996. These responses are filed in accordance with Presiding Officer's Ruling on Office of the Consumer Advocate Motions to Compel Interrogatory Responses, Ruling MC96-3/12, September 12, 1996.

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[Signature]

The responses to OCA/USPS-25(a) and 37(b) indicate that the Postal Service is still working on preparing the requested information and will produce it as soon as possible. Preparing the response to 25(a) has taken longer than estimated due to staffing shortages and end of fiscal year workload in the office preparing the response. Masking the finance numbers in order to respond to 37(b) has taken longer than originally estimated. Also, unanticipated and unavoidable problems gaining access to the mainframe computer have added to the time needed to prepare both responses. Accordingly, the Postal Service requests an extension of time to complete its responses to these interrogatories. The Postal Service hopes to have its responses ready by the end of the week.

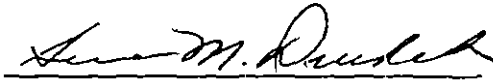
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



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September 23, 1996

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OCA/USPS-T-37. Please refer to Tables 4-6 of USPS-LR-SSR-90.

- a. Please provide the programs used to produce the cost and c.v. estimates presented in these tables. If they have already been provided, please provide a citation to the appropriate MC96-3 library reference.
- b. Please confirm that the IOCS FY 1995 data file provided as USPS-LR-SSR-22 is the only input file required by the programs used to produce Tables 4-6 of SSR-90. If you do not confirm, please provide the additional files.

OCA/USPS-37 Response:

- a. See USPS LR-SSR-150.
- b. The Postal Service is working on this request and will provide the information as soon as possible.

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OCA/USPS-25. Please refer to Attachment 2 to OCA/USPS-T5-13b.


- a. Please provide a similar table containing employee universe counts.
- b. Please confirm that these employee universe counts are used to develop estimation weighting factors. If you do not confirm, please explain and provide the appropriate employee universe counts used for weighting.

OCA/USPS-25 Response:

- a. The Postal Service is working on this request and will provide the information as soon as possible.
- b. Response filed August 23, 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.

  
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Susan M. Duchek

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