

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS COLLINS
(USPS/OCA-T400-1-4)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: (USPS/OCA-T400-1-4).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

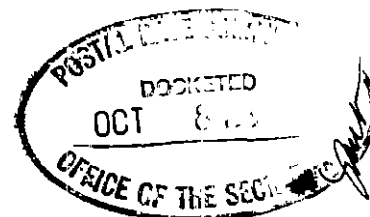
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Anthony F. Alverno

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475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -5402
October 8, 1996



USPS/OCA-T400-1. Please refer to page 3 lines 8-9 of your testimony. Confirm that your opposition to the Postal Service's proposal to raise revenues outside an omnibus rate case is based solely on policy grounds. Please explain any negative response.

USPS/OCA-T400-2. Please refer to page 6 lines 1-11 of your testimony and to Exhibit USPS-T-1C. Please confirm the following:

- a. The before-rates attributable cost for certified mail in this filing is \$297,811,000.
- b. The before-rates revenues for certified mail in this filing are \$318,574,000.
- c. The before-rates cost coverage for certified mail in this filing is 107 percent.
- d. The after-rates attributable cost for certified mail in this filing is \$285,880,000.
- e. The after-rates revenues for certified mail in this filing are \$416,705,000.
- f. The after-rates cost coverage for certified mail in this filing is 146 percent.
- g. If your responses to any of subparts a-f above are negative, identify with specificity all information which is either lacking or precludes you from offering a confirmation.

USPS/OCA-T400-3. Please refer to page 8 lines 15-17 of your testimony.

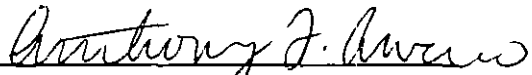
- a. Identify the date on which the initial response to OCA/USPS-T8-8 was filed.
- b. Identify the *three* dates on which revisions were filed to witness Needham's response to OCA/USPS-T8-8.
- c. Confirm that witness Needham's final revision to OCA/USPS-T8-8 was filed two days before her appearance on her USPS-T-8 testimony.

USPS/OCA-T400-4. Please refer to page 20 lines 1-7 of your testimony.

- a. Please provide a schedule comparable to Schedule SS-16 with your proposed fees.
- b. Please provide the before- and after-rates total attributable costs for return receipts.
- c. Please provide the before- and after-rates total revenues for return receipts.
- d. Please provide the before- and after-rates cost coverages for return receipts.

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.


Anthony F. Alverno

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