

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-T400-21-24)

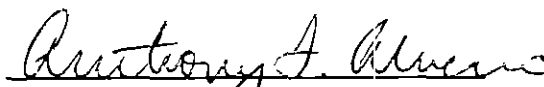
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: (USPS/OCA-T400-21-24).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anthony F. Alverro

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October 21, 1996

USPS/OCA-T400-21. On page 3, lines 8 and 9 of your testimony you state "I oppose this attempt to raise revenues outside an omnibus rate case".

- a. Is it your testimony that rates and revenues can never be increased except in an omnibus rate case? If your answer to (a) is affirmative, please identify all legal authority of which you are aware that supports your conclusion.
- b. If your answer to (a) is negative, please explain the circumstances under which you feel rates and revenues can be increased and how you reached this conclusion.

USPS/OCA-T400-22. Please refer to page 3 lines 15-18 of your testimony where you state "The proposal concerning return receipt service includes a modest classification fee structure change and a large fee increase for most users. The small increase in cost that the classification change entails cannot justify the fee increase and I urge the Commission to reject it."

- a. Should fee increases only be based on cost increases? Please explain your answer fully.
- b. Should any criteria other than costs be considered when raising fees? Please identify all such other criteria.
- c. Would you agree that certified mail and return receipt have a high value of service? If your answer is no please explain.

USPS/OCA-T400-23. Please turn to page 25 of your testimony.

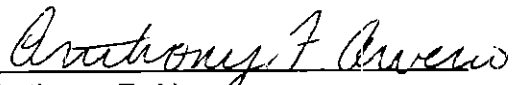
- a. Please confirm that postal cards generally have a higher value of service than private cards. If you do not confirm, please explain.
- b. Assume hypothetically that postal card manufacturing costs are not part of postal and postcard subclass attributable costs, but rather are included in the institutional costs of the Postal Service.
  - i. Under this scenario, would you support a proposal to include postal card manufacturing costs in the attributable costs of the postal and postcard subclass in this docket? If not, why not? If yes, why?
  - ii. Under this scenario, would you support a proposal for a stamped card fee as proposed by witness Needham in USPS-T-8? If not, why not? If yes, why?

OCA/USPS-T400-24. The following refers to your testimony as a whole.

- a. Please confirm that you read a final version of Dr. Sherman's testimony (OCA-T-100) in this docket prior to filing your testimony.
- b. Do you agree with all statements made in Dr. Sherman's testimony in this docket (OCA-T-100)? If your answer is other than an unqualified yes, please identify all statements in witness Sherman's testimony (by page and line number) with which you disagree and why you disagree with Dr. Sherman with regard to those statements.

**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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