

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-T400-30-38)

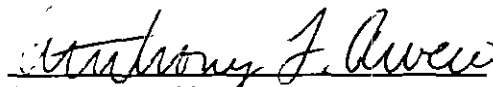
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Collins: (USPS/OCA-T400-30-38).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

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October 25, 1996



USPS/OCA-T400-30. Please refer to your testimony at page 20 lines 4-5. In reference to the return receipt proposal, you state that you "recommend that the proposed classification change be adopted but without a fee increase."

- a. Please confirm that you support the classification changes proposed by the Postal Service in Classification Schedule SS-16, including section 16.0211. If you cannot confirm, please explain.
- b. Please confirm that section 16.0211 applies to
 - i. return receipt service purchased in conjunction with the products in Classification Schedule SS-16 section 16.020(a)-(e).
 - ii. return receipt for merchandise service, as described in Classification Schedule SS-16 section 16.020(f)-(g).
- c. If you are unable to confirm subpart b(i) and/or (b)(ii), please explain.

USPS/OCA-T400-31. Please refer to your response to USPS/OCA-T400-5(b).

- a. Please confirm that witness Foster's Workpaper VIII, page 5, in Docket No. R94-1, shows that certified mail revenue, exclusive of ancillary service revenue, is \$293,220 thousand? If you are unable to confirm, please explain.
- b. Please confirm that the Docket R94-1 after rates revenue for certified mail of \$526,248 thousand, which is cited in your response to 5(b), included ancillary services revenues.
- c. If you are unable to confirm (b) above, please state whether you are capable of analyzing revenues for certified mail in Docket No. R94-1 to determine whether ancillary revenues are present or absent from the \$526,248 thousand figure.

- d. If your response to (c) is that you are not capable of analyzing Docket No. R94-1 revenues for certified mail to detect the presence or absence of ancillary service revenues, please identify the information you claim is lacking in the R94-1 and MC96-3 records to enable you to make such a determination.

USPS/OCA-T400-32. Please refer to your response to USPS/OCA-T400-8(c). You characterize witness Needham as discussing the value of service of certified mail from the recipient's perspective as being "confined to the high value of this response to the sender." What information, beyond that which witness Needham discussed at page 70 lines 3-15 and page 71 lines 1-2 of USPS-T-8, would you consider in analyzing the value of service to the recipient of certified mail?

USPS/OCA-T400-33. Please refer to your response to USPS/OCA-T400-11(c). You state that recent improvements that have been made to return receipts "are there regardless of whether or not the Postal Service's proposals for return receipt are adopted."

- a. Is it your testimony that historical information about a product should not be considered when evaluating a proposal for a change in a rate or fee for that product under 39 U.S.C. § 3622? Please explain your response.
- b. Is it your testimony that service or operational changes that may detract from or enhance the value of service of that product to customers should not inform an analysis of a proposal to change a rate or fee for that product under 39 U.S.C. §§ 3622? Please explain your response.

USPS/OCA-T400-34. Please refer to your response to USPS/OCA-T400-1.

- a. The testimony of other OCA witnesses notwithstanding, is your statement at page 3 lines 8-9 that you "oppose this attempt to raise revenues outside an omnibus rate case" intended to convey your opposition to the Postal Service's proposals in this docket on policy grounds alone, or is it intended to convey your opposition to the Postal Service's proposals in this docket on any other grounds? If the latter, then please identify all such other grounds.
- b. Please explain how witness Sherman's testimony is to be characterized, if it is not "purely policy."
- c. Please explain how witness Thompson's testimony is to be characterized, if it is not "purely policy."

USPS/OCA-T400-35. Please refer to your response to USPS/OCA-T400-2. Do you confirm the figures in subparts (a) through (f)? If not, please identify what precludes you from offering a confirmation, as opposed to a factual statement of where these figures are found.

USPS/OCA-T400-36. Please refer to your response to subpart b of USPS/OCA-T400-3(b).

- a. Please confirm that *revisions* to OCA/USPS-T8-8 were filed only on two separate occasions in this docket.
- b. Please confirm that the sentence in your testimony that begins at page 8 line 15 would be accurate if it were corrected to read as follows:

This interrogatory has been answered once and revised ~~three~~
two times . . .

If you do not confirm, please explain.

USPS/OCA-T400-37. Please refer to your response to USPS/OCA-T400-3(c).

- a. You state that during his appearance at the Commission hearing on September 9, 1996, witness Lyons "gave the first real indication of a fundamental change to the underlying costing." Please confirm that witness Needham explained witness Lyons' statement as follows at Tr. 4/1198:

19 THE WITNESS: I'd like to just state here that
20 what Witness Lyons was referring to was not a major
21 structuring -- a major structural change in the costing of
22 Certified Mail but, rather, in the cost coverage
23 methodology.

- b. If you cannot confirm the response to subpart (a), please explain.

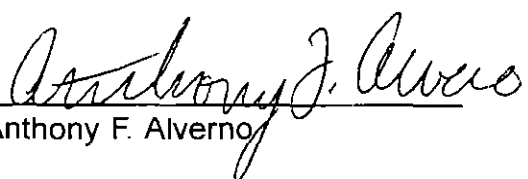
USPS/OCA-T400-38. Please refer to your response to USPS/OCA-T400-17.

- a. Is it your testimony that no information was provided on the maximum paid claim for Express Mail document reconstruction before your testimony was filed? If your response is negative, please identify such information, and provide a description of it.
- b. Is it your testimony that no information was provided on the maximum paid claim for Express Mail document reconstruction after your testimony was filed? If your response is negative, please identify such information, and provide a description

of it.

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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