

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. MC96-3

SPECIAL SERVICES REFORM, 1996

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO OFFICE OF THE CONSUMER ADVOCATE
WITNESS COLLINS (USPS/OCA-T400-39-44)


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 Office of the
Consumer Advocate witness Collins: (USPS/OCA-T400-39-44).

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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.


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 30, 1996

POSTAL RATE COMMISSION
DOCKETED
OCT 30 1996
OFFICE OF THE SECRETARY

USPS/OCA-T400-39. Please confirm that the cost coverages you calculate at page 23, lines 19 and 21 of your testimony are based on the Postal Service's cost methodology as reflected in the testimony and exhibits of witness Patelunas, USPS-T-5. If you do not confirm, please explain in detail.

USPS/OCA-T400-40. Please confirm that the 20-cent rate for postal and post cards is based on a markup of costs that reflects the Commission's cost methodology as reflected in its recommended decision in Docket No. R94-1 on Reconsideration. If you do not confirm, please explain in detail.

USPS/OCA-T400-41. Please confirm that under the Commission's cost methodology as reflected in PRC-LR-1 and 2 in this docket, the difference in the unit cost of postal cards and post cards is less than under the Postal Service's cost methodology. If you do not confirm, please explain in detail.

USPS/OCA-T400-42. Please confirm that the 263 percent cost coverage figure for postal cards cited at page 23, line 19 of your testimony becomes 193 percent using the Commission's cost methodology as reflected in PRC-LR-1 and 2 in this docket (19.7 cents revenue/10.23 cents attributable costs in BY 1995). If you do not confirm, please explain in detail.

USPS/OCA-T400-43. Please confirm that the 289 percent cost coverage figure for

postal cards cited at page 23, line 21 of your testimony becomes 209 percent using the Commission's cost methodology as reflected in PRC-LR-1 and 2 in this docket (22 cents revenue/10.55 cents attributable costs in TY 1996). If you do not confirm, please explain in detail.

USPS/OCA-T400-44.

- a. Did you review and/or consider the Commission's cost methodology as set forth in PRC-LR-1 and 2 in preparing any part of your testimony? If so, how did you use the Commission's cost methodology? If not, why not?
- b. Did you review and/or consider the Commission's cost methodology as set forth in PRC-LR-1 and 2 in preparing the stamped card portion of your testimony? If so, how did you use the Commission's cost methodology? If not, why not?
- c. If you did not review and/or consider the Commission's cost methodology as set forth in PRC-LR-1 and 2, why did you need an extension of time from September 25, 1996 to September 30, 1996 to prepare and file your testimony?