

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: ANTHONY M. YEZER (OCA/USPS-T31-1-5)
February 15, 2000

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-14 dated January 24, 2000, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T31-1. Please refer to your testimony at page 2, lines 7-11.

- (a) Please identify by name and provide citations to the "significantly smaller group of papers" that have considered office rents in selected cities.
- (b) Please explain how the predictive model developed in your research for the Postal Service is consistent with the research in the papers identified in part (a) of this interrogatory.
- (c) Please explain how the predictive model developed in your research for the Postal Service is inconsistent with the research in the papers identified in part (a) of this interrogatory.

OCA/USPS-T31-2. Please refer to your testimony at pages 2 and 3, lines 20-21 and lines 1-2, respectively. Please explain whether you agree with the Postal Service's decision to use the econometric model developed in your research to predict rent per square foot for specific facilities rather than an index of rental price differences over space. In your answer, please compare and contrast the advantages and disadvantages of the former and the latter.

OCA/USPS-T31-3. Please refer to your testimony at page 3, lines 9-10. Has your research for the Postal Service been used to predict rent per square foot at facilities that do *not* provide post office box service?

OCA/USPS-T31-4. Please refer to your testimony at page 3, lines 11-17.


- (a) Please confirm that the Postal Service offers post office box service in facilities that are postal-owned. If you do not confirm, please explain.
- (b) Please explain how your econometric model predicts the rent per square foot in postal-owned facilities having post office boxes. In your answer, please explain

any assumptions about the age, location, condition and suitability of postal-owned facilities having post office boxes as compared to leased facilities having post office boxes.

OCA/USPS-T31-5. Please refer to your testimony at pages 6 and 7, lines 19-20, and line 1, respectively. Please explain how knowing the "distance north-south or east-west from the [Central Business District]" improves the prediction of rent per square foot.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Stephanie Wallace

Washington, D.C. 20268-0001
February 15, 2000