

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 WILLIAM P. TAYMAN (OCA/USPS-T9-30-38)
March 7, 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-T9-30. For purposes of this interrogatory, and interrogatories OCA/USPS-T9-31-38, please consider postal services to be services that the Postal Service has begun offering during the 1988-1998 period after filing a request with the Postal Rate Commission under 39 U.S.C. §3623, and/or that the Postal Service has changed the rate or fee of a service by filing a request with the Commission under 39 U.S.C. § 3622. Please consider nonpostal services to be any other service provided by the Postal Service to the public, including retail services. Please refer to Table 2 of your testimony. In Table 2 you set forth total revenues (column 2) and total expenses (column 4) for fiscal years 1988-1998. For each of the eleven fiscal years set forth in the table, please break out the total revenue figures into revenues generated by postal services and revenues generated by nonpostal services. Also break out each total expense figure into expenses generated on behalf of postal services and expenses generated by nonpostal services.

OCA/USPS-T9-31. For each of the fiscal years set forth in Table 2 (*i.e.*, 1988-1998), state, to the best of your knowledge, whether nonpostal services, in the aggregate, generated a surplus or a loss. For each of these years, please provide an estimate of the amount of the surplus or loss. Also, describe how the estimate is developed.

OCA/USPS-T9-32. Does the Postal Service keep a system of accounts for nonpostal services that is separate from its system of accounts for postal services? Please describe the accounting and data systems that are used to track nonpostal services' costs, revenues, and volumes.

OCA/USPS-T9-33. Are any nonpostal services currently being offered at no charge to the users of the service? If so, please list all such services. Also, if your answer is affirmative, please state the source(s) of funds for operating each such service. If postal services are directly or indirectly the source of funds, then please so state.

OCA/USPS-T9-34. Are any nonpostal services currently being offered at a rate or fee that does not cover the cost of providing the service? If so, please list all such services. Also, if your answer is affirmative, please state the source(s) of funds that make up any deficits in providing the service. If postal services are directly or indirectly the source of funds, then please so state.

OCA/USPS-T9-35. Is it the policy of the Postal Service to operate nonpostal services, in the aggregate, so that the revenues taken in from all such services exceed the costs of operating the services? If the answer is affirmative, then state all practices employed by the Postal Service to ensure that nonpostal revenues exceed nonpostal costs. If the answer is negative, then is it correct that postal services (directly or indirectly) fund any expenses that exceed revenues taken in for nonpostal services? Please explain in full.

OCA/USPS-T9-36. Please list all nonpostal services currently offered by the Postal Service. For each service, describe what services and/or products are offered and whether a fee is charged. Also, if fees are charged, state the amount of the fee.

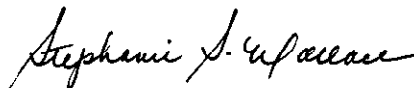
OCA/USPS-T9-37. Do any nonpostal services incur costs jointly with postal services (e.g., the service is provided at the window of a postal facility by a clerk)? If so, how are

the costs allocated between the nonpostal services and the postal services? Please explain in full.

OCA/USPS-T9-38. For purposes of this interrogatory, please apply the definition of postal services and nonpostal services set forth in interrogatory OCA/USPS-T9-30, but for the period beginning with Postal Reorganization—the present. Please refer to Table 53 of your testimony. On line 5 of this table you set forth the “Total Recovery Required” of \$2,414,313,000. To the best of your knowledge, does any portion of the \$2,414,313,000 of prior years’ losses reflect losses incurred due to a failure of nonpostal services to cover their costs, in aggregate, during any of the fiscal years since Postal Reorganization? If so, for each fiscal year since 1971 for which you have such information, please state the amount of the loss generated in the aggregate by nonpostal services.

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 S. Wallace

Washington, D.C. 20268-0001
March 7, 2000