



BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS ANTHONY M. YEZER
(DFC/USPS-T31-1-7)

March 20, 2000

Pursuant to sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Anthony M. Yezer.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

Respectfully submitted,

Dated: March 20, 2000

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.

DOUGLAS F. CARLSON

March 20, 2000
Emeryville, California

DFC/USPS-T31-1. Please explain in detail how you calculated facility rental costs for post-office boxes located at facilities that the Postal Service owns.

DFC/USPS-T31-2. For facilities that the Postal Service owns, did you impute a rental cost to the facility based on market rental costs near the facility? If the answer is yes, please explain why imputing a rental cost does not overstate the cost of the facility to the Postal Service and box customers. Please explain your answer.

DFC/USPS-T31-3. Please provide the percentage of facilities that have post-office boxes that are in government-owned buildings. If a distinction exists between government-owned buildings and Postal Service–owned buildings, please explain and provide information for both.

DFC/USPS-T31-4. For the facilities that have post-office boxes that are in government-owned buildings or Postal Service–owned buildings, please provide the median and average construction date (or age) of these buildings and the median and average rental cost per square foot for boxes that you assigned for these buildings.

DFC/USPS-T31-5. Please provide the median and average rental cost per square foot for rented space (not government-owned or Postal Service–owned).

DFC/USPS-T31-6. Please provide the median and average rental cost per square foot for facilities that have post-office boxes.

DFC/USPS-T31-7. Please refer to your response to OCA/USPS-T31-2.

- a. Please provide all facts and information that you possess or upon which you relied to determine that customers will find post-office boxes located in malls to be convenient.
- b. Which proportion of box customers whose boxes are located in a mall would find a location away from the mall more convenient than a location in a mall due to problems associated with traffic, parking, and other maladies that may plague malls (e.g., in peak shopping seasons)? Please explain.
- c. Please explain the choice that customers have about the place where the Postal Service decides to locate post-office boxes.
- d. You stated that the convenience associated with mall locations should be reflected in pricing for boxes. Please discuss why it would be fair to charge a premium for the convenience that you have identified of mall locations to customers who are indifferent to mall locations or who dislike mall locations.
- e. Please confirm that, due to Postal Service decisions on locating postal facilities, customers may use a postal facility for reasons other than the convenience of the facility's location. (For example, a post office located in a mall may be the only post office in a particular city or community.) If you do not confirm, please explain.