

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 PATELUNAS (OCA/USPS-ST44-1-3)
JULY 14, 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-ST44-1. The following question relates to USPS-LR-I-406. USPS-LR-I-406 consists of electronic files for FY 99, FY 00 and FY 01. Many of the files have similar names with varying file extensions. For purposes of this interrogatory, please assume that an asterisk represents the file extension (*). Please explain what each of the following seven file acronyms represent: (1) FY99tcm.*; (2) FY00mix.*; (3) FY00xt.*; (4) FY01at.*; (5) FY01atm.*; (6) FY01b.*; and (7) FY01bm.*.

OCA/USPS-ST44-2. Does your supplemental testimony rely upon the same FY 99 data as that used by USPS witness Kashani for the following components: (1) USPS component 555 - Total Square Feet; (2) USPS component 562 – Total Rental Value; (3) USPS component 1299 – Capital; (4) USPS component 1298 – Maintenance Labor; and (5) USPS component 1297 - Parts and Supplies? If not, please provide a printout of the information you used in a format similar to that provided in USPS witness Kashani's Workpaper A at 152 – 154. Include in your printout the applicable component numbers used.

OCA/USPS-ST44-3. Please provide as a library reference printouts similar to those provided as workpapers by USPS witness Kashani. Please give priority to providing the following printouts: (1) your FY 99 data in a format similar to USPS witness Kashani's workpaper A; and (2) "B Reports" for FY 00 and FY 01.

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
July 14, 2000