

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)

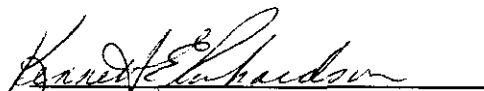
Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORY TO UNITED STATES POSTAL SERVICE  
WITNESS PATELUNAS (OCA/USPS-ST44-4)  
JULY 17, 2000

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Pursuant to Sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request 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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Director  
Office of the Consumer Advocate

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OCA/USPS-ST44-4. The following interrogatory refers to USPS-LR-I-422, Excel file WC01\_Or.xls.

- (a) Please confirm that in USPS-LR-I-126 at 92, the USPS estimated a 10.5 percent increase  $((\$1,198,124,884 / \$1,083,966,019)-1)$  in the "medical portion" of workers' compensation for FY 01. If you are unable to confirm, please explain.
- (b) Please specifically identify the rationale used and cite any sources relied upon when the "medical portion" of workers' compensation for FY 01 was modified from the 10.5 percent increase in the original filing to a 20.6 percent increase in your supplemental testimony  $((\$1,493,034,282 / \$1,238,103,369)-1)$ .
- (c) Please explain how the USPS estimated increase of 20.6 percent in the "medical portion" of the FY 01 workers' compensation compares to the FY 01 national average estimate. If no comparison is available, please explain what comparison (if any) the USPS performs when preparing its workers' compensation estimates. If no comparisons are performed, please explain why none are done.
- (d) Please confirm that in USPS-LR-I-126 at 92, the USPS estimated a 6.5 percent increase  $((\$4,565,057,984 / \$4,286,193,352)-1)$  in the "base compensation liability" from FY 00 to FY 01. If you are unable to confirm, please explain.
- (e) Please specifically identify the rationale used and cite any information provided that led to the decrease from 6.5 percent to the 3.3 percent

(((\$4,184,293,872 - \$4,049,782,684)-1) "compensation portion" cost increase for FY 01.

(f) Please confirm the following:

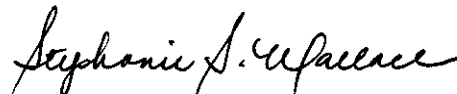
(1) Actual USPS FY 00 Q3 expense for the "medical portion" of workers' compensation is \$1,238,103,369.

(2) Actual USPS FY 00 Q3 expense for the "compensation portion" of workers' compensation is \$4,049,782,684.

(3) If you are unable to confirm parts (1) and (2) of this interrogatory, please provide the actual expenses. If Q3 expenses are unavailable, please indicate when they will be available and provide them at that time.

#### 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 17, 2000