

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-ST44-46-47)
JULY 25, 2000

Pursuant to Sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate ("OCA") hereby submits interrogatories and requests for production of documents. The interrogatories are submitted for the purpose of the development of changes to the OCA's direct case-in-chief in supporting revisions to test year forecasts and for the development of rebuttal testimony. Instructions included with OCA interrogatories OCA/USPS-1-14 dated January 24, 2000 are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN

Director

Office of the Consumer Advocate

KENNETH E. RICHARDSON
Attorney

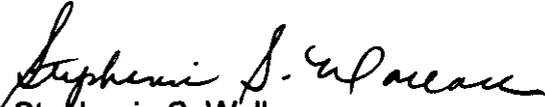
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OCA/USPS-ST44-46. The following refers to USPS-LR-I-421, Excel file "SPTDC_OR.XLS," worksheet "Non Pers Other Programs", cells E58, and E64 through E67. Please explain how you determined the following FY 00 amounts for absorbing additional inflation: (1) (\$7,000) – HQ S&S; (2) (\$8,000) – operating equipment; (3) (\$20,000) – miscellaneous S&S; (4) (\$7,000) – ADP S&S; and (4) (\$5,000) – Vehicle S&S. Please note that trailing zeros have been omitted.

OCA/USPS-ST44-47. The following refers to USPS-LR-I-410, Volume G and USPS-T-14, workpaper J. In workpaper J, the FY 01 after rate employee mix adjustment is (\$2,658,000). In USPS-LR-I-410, the FY 01 after rate employee mix adjustment is \$213,750,000. Please explain what caused the significant increase in the employee mix adjustment.

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 25, 2000