

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS PATELUNAS TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-ST44-1-3)

The United States Postal Service hereby provides the responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-ST44-1-3, filed on July 14, 2000.

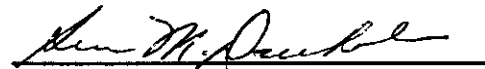
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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July 28, 2000

**Response of United States Postal Service witness Patelunas
to Interrogatories of
Office of the Consumer Advocate**

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.*.

Response The abbreviated file names represent the following:

- (1) FY99tcm.* is Fiscal Year 1999 after migration of Standard A Single Piece,
- (2) FY00mix.* is Fiscal Year 2000 before the workyear mix adjustment,
- (3) FY00xt.* is Fiscal Year 2000 after the workyear mix adjustment,
- (4) FY01at.* is Fiscal Year 2001 before the workyear mix adjustment at proposed rates,
- (5) FY01atm.* is Fiscal Year 2001 after the workyear mix adjustment at proposed rates,
- (6) FY01b.* is Fiscal Year 2001 before the workyear mix adjustment at current rates,
and
- (7) FY01bm.* is Fiscal Year 2001 after the workyear mix adjustment at current rates.

**Response of United States Postal Service witness Patelunas
to Interrogatories of
Office of the Consumer Advocate**

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.

Response No, my supplemental testimony relies upon actual FY 99 data as reflected in the FY 99 Cost and Revenue Analysis report. Please see USPS-LR-I-410, which is the supplemental testimony equivalent of witness Kashani's workpapers.

**Response of United States Postal Service witness Patelunas
to Interrogatories of
Office of the Consumer Advocate**

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.

Response See USPS LR-I-410.

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Richard Patel

Dated: 7/28/00

CERTIFICATE OF SERVICE

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



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