

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-ST44-46-47)

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-ST44-46-47, filed on July 25, 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



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
August 7, 2000

**RESPONSE OF WITNESS PATELUNAS TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE:

These are the same amounts reflected in the original filing. Their derivation was explained in the response to OCA/USPS-T9-1e.

**RESPONSE OF WITNESS PATELUNAS TO INTERROGATORIES OF
OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE:

As explained on page 7 of my testimony the main reason for the increase in the test year after rates workyear mix adjustment was an assumed reduction in the number of clerk and mail handler casual workyears. The calculations supporting these amounts are detailed in Chapter IX of LR I-421.

DECLARATION

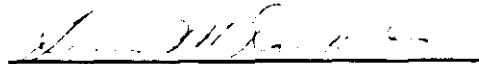
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

Richard Patelunas

Dated: 8/7/00

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.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
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