

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, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DEGEN TO  
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T12-12-15)

The United States Postal Service hereby provides responses of witness Degen to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T12-12-15, filed on July 25, 1997.

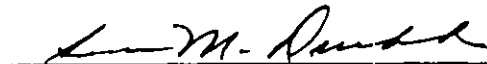
Each interrogatory is stated verbatim and is followed by the response.

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  
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Response of United States Postal Service Witness Degen  
to Interrogatories of Office of the Consumer Advocate

OCA/USPS-T12-12. Please refer to lines 151-155 (the KEEP option) of program MBC of LR-H-146.

- a. Please confirm that among the variables kept at this stage of the program are variables F266 and F226. If you do not confirm, please explain how to interpret this SAS "KEEP" option.
- b. Please confirm that this program MBC operates on the FY 1996 IOCS data file contained in LR-H-23. If you do not confirm, please describe all files this program relies upon.
- c. Please confirm that the SAS program that produced the H-23 IOCS file does not output any values for the variables F266 and F226. See pages 5-10 of the printed documentation accompanying the IOCS file. If you do not confirm, please explain and, if necessary, update pages 5-10 of H-23.
- d. Please define the variables F266 and F226.
- e. Are the variables F226 and F266 used in LR-H-146? If so, please describe how they are used.
- f. Do other Postal Service witnesses or library references rely upon the values of F266 and F226? If so, please describe how they are used.

OCA/USPS-T12-12 Response.

- a. Confirmed.
- b. Program MBC, as it appears in LR-H-146, operates on the IOCS tally file in the form of a SAS data set which contains numerous fields which are not used by any programs in LR-H-146. The LR-H-23 file is a flat file representation of that SAS data set which permits replication of results based on IOCS data, and which facilitates distribution of the relevant data. It would be more accurate to say that the LR-H-23 file is compatible with the programs in LR-H-146, including program MBC. In the "MODTABLE" data step, program MBC employs the file "MODF96," which identifies the finance numbers in IOCS which belong to the MODS 1&2 office group. The "MODF96" file was included on the LR-H-146 diskette as modsfin2.dat.

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- c. Confirmed.
- d. I am informed that F226 and F266 are undefined in the FY 1996 IOCS data file.
- e. No.
- f. I am not aware of any other witnesses or library references that make use of F226 or F266.

Response of United States Postal Service Witness Degen  
to Interrogatories of Office of the Consumer Advocate

OCA/USPS-T12-13. Please refer to library reference H-23, line 2 of program MOD1DIR. This line sets an error option with the statement "OPTIONS ERRORS=1;". Please explain the purpose of this SAS statement.

OCA/USPS-T12-13 Response.

I consulted the *SAS User's Guide: Basics, Version 5 Edition* (Cary, NC: SAS Institute, Inc., 1985), p. 434. The function of the "OPTIONS ERRORS" statement is to "specify the maximum number of observations for which complete error messages are printed."

I am informed that this statement was included in MOD1DIR and several other programs in LR-H-146 to limit the size of the programs' SAS log files.

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OCA/USPS-T12-14. Please refer to lines 43-45 of MOD1DIR or to lines 65-67 of NONMOD12, LR-H-23. These lines contain the following SAS statement:

```
IF 'B'<=F133<='E' OR F133='M'  
OR 'A'<=F9635<='C' OR F9635='K' THEN HANDLING = ' PC_CRD';  
ELSE HANDLING = ' PC_LTR';
```

- a. Please confirm that the variable F9635 contains single piece shape after June 30, and F133 contains single piece shape prior to July 1, 1996. If you do not confirm, please explain the difference between these two shape variables.
- b. Please confirm that an F9635 value of 'A' corresponds to letters, 'B' corresponds to cards, 'C' corresponds to USPS forms, and 'K' corresponds to detached address cards. If you do not confirm, please explain how to interpret H-23, page 44.
- c. Please confirm that an F133 value of 'A' corresponds to letters, and values 'B', 'C', 'D', 'E', and 'M' correspond to cards. If you do not confirm, please explain how to interpret H-23, page 44.
- d. Please explain why the variable HANDLING is set to 'PC\_LTR' for letter shaped tallies received prior to July 1, but it is set to 'PC\_CRD' for letter shaped tallies received after June 30, 1996.

OCA/USPS-T12-14 Response.

- a. Confirmed.
- b. Confirmed.
- c. F133 value 'D' corresponds to USPS forms. Confirmed for other codes.
- d. The program is in error. The statement should read:

```
IF 'B'<=F133<='E' OR F133='M'  
OR 'B'<=F9635<='C' OR F9635='K' THEN HANDLING = ' PC_CRD';  
ELSE HANDLING = ' PC_LTR';
```

The error affects the shape distribution factors used to distribute loose letters and cards in "identified" containers, and thus will have some effect on the container and

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not-handling stages of the distribution key formation process. Attachment 1 to this response contains corrected volume-variable costs by subclass and cost pool.

## Attachment 1 -- Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	MODS 1&2							
	bcs/	express	fsm/	ism/	manf	manl	manp	mecparc
Letters and Parcels	341,925	2,317	370,569	494,594	175,531	632,527	4,328	1,518
Presort Letters and Parcels	168,983	483	18,324	69,797	12,845	119,617	546	18
Postal Cards	0	0	0	604	0	552	0	0
Private Mailing Cards	6,755	78	369	26,377	77	34,014	2	99
Presort Cards	3,380	0	3	3,673	336	8,502	1	0
Priority	393	1,924	7,983	247	10,050	4,215	6,663	3,081
Express	108	26,727	164	490	768	1,309	421	1
Mailgrams	0	0	0	0	0	72	0	0
Within County	2	1	501	99	2,923	639	0	12
Outside County - Regular	614	174	39,303	931	72,575	10,753	1,024	513
Outside County - Non Profit	385	5	8,049	393	10,795	2,123	201	171
Outside County - Classroom	1	0	831	1	383	1	0	7
Third Single Piece Rate	2,255	159	4,169	2,402	4,207	7,679	312	8
Bulk - Regular Carrier Route	8,820	11	9,225	3,194	6,895	9,801	564	223
Bulk - Regular Other	77,952	270	171,614	30,016	111,481	148,954	3,172	484
Bulk - Non Profit Carrier Route	2,160	1	661	666	608	1,530	1	84
Bulk - Non Profit Other	25,676	107	27,307	13,993	22,942	61,677	181	369
Parcels - Zone Rate	41	14	1,311	93	711	626	3,393	1,221
Bound Printed Matter	58	6	2,023	17	2,732	378	555	317
Special Rate	4	107	1,161	104	802	301	992	101
Library Rate	2	0	325	1	671	84	254	197
USPS	705	923	4,299	2,148	1,626	5,325	512	78
Free for Blind/Handicapped	2	1	0	1	553	396	0	2
International	2,865	2,062	6,507	10,660	5,399	13,706	544	6
Registry	27	57	112	39	65	544	52	3
Certified	0	0	0	0	0	0	0	0
Insurance	0	0	0	0	0	0	0	0
COD	0	0	0	0	0	0	0	0
Special Delivery	0	28	0	0	0	0	0	0
Special Handling	0	0	0	0	0	0	0	0
Other Special Services	774	2	1,728	1,630	885	4,509	1	152
<b>Total</b>	<b>643,886</b>	<b>35,456</b>	<b>676,538</b>	<b>662,170</b>	<b>445,858</b>	<b>1,069,833</b>	<b>23,719</b>	<b>8,666</b>

## Attachment 1 -- Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	ocr/	priority	spbs Oth	spbs Prio	BusReply	INTL	LD15	LD41
Letters and Parcels	119,023	7,861	19,857	9,517	7,334	8,182	276,906	8,586
Presort Letters and Parcels	27,271	1,013	903	1,310	926	1,160	53,179	5,656
Postal Cards	71	0	0	0	0	0	0	0
Private Mailing Cards	3,030	165	86	21	476	259	8,843	0
Presort Cards	827	0	136	12	129	0	1,850	91
Priority	29	80,632	7,017	27,718	285	2,006	0	10
Express	2	1,173	0	32	114	1,990	0	0
Mailgrams	0	0	0	0	0	0	0	0
Within County	0	2	151	2	1	24	0	0
Outside County - Regular	260	630	5,229	1,161	18	1,106	1,186	76
Outside County - Non Profit	86	8	1,229	135	2	81	0	0
Outside County - Classroom	0	0	139	0	0	3	0	0
Third Single Piece Rate	357	396	1,073	189	447	119	1,938	109
Bulk - Regular Carrier Route	2,407	285	6,514	793	11	121	4,506	236
Bulk - Regular Other	12,617	704	29,095	1,697	547	1,405	22,373	1,600
Bulk - Non Profit Carrier Route	797	9	478	12	1	1	0	68
Bulk - Non Profit Other	5,710	169	5,866	108	99	329	4,547	364
Parcels - Zone Rate	6	369	705	1,032	157	236	0	0
Bound Printed Matter	2	97	1,104	180	160	1	0	0
Special Rate	76	171	384	252	0	2	0	0
Library Rate	0	4	236	2	1	34	0	0
USPS	446	3,064	668	536	277	292	1,321	0
Free for Blind/Handicapped	1	67	511	556	1	123	0	76
International	2,491	2,726	143	1,029	294	65,706	5,932	0
Registry	148	42	33	78	89	3,453	0	0
Certified	0	0	0	0	756	33	0	0
Insurance	0	0	0	0	0	0	0	0
COD	0	0	0	0	0	0	0	0
Special Delivery	0	0	0	0	0	0	0	0
Special Handling	0	0	0	0	0	4	0	0
Other Special Services	561	97	111	2	12,857	5	956	0
<b>Total</b>	<b>176,219</b>	<b>99,686</b>	<b>81,666</b>	<b>46,373</b>	<b>24,981</b>	<b>86,674</b>	<b>383,539</b>	<b>16,873</b>



## Attachment 1 -- Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	LD42	LD43	LD44	LD48 Exp	LD48 Oth	LD48_SSV	LD49	LD79
Letters and Parcels	893	168,942	59,094	214	7,833	4,156	81,152	7,794
Presort Letters and Parcels	106	43,034	18,008	16	2,356	894	61,937	18,438
Postal Cards	0	84	0	0	2	0	0	0
Private Mailing Cards	15	4,036	1,079	1	275	113	5,631	1,334
Presort Cards	37	917	68	0	46	0	1,963	1,131
Priority	21	29,354	3,526	19	1,132	588	1,711	1,606
Express	1	4,214	757	1,092	257	1,330	12	33
Mailgrams	0	0	0	0	0	0	0	0
Within County	0	1,006	138	0	23	0	648	423
Outside County - Regular	59	21,991	3,189	9	721	180	21,683	1,270
Outside County - Non Profit	1	3,488	415	0	140	81	5,671	787
Outside County - Classroom	0	87	0	0	2	0	1	0
Third Single Piece Rate	77	3,261	67	1	124	80	8,241	1,072
Bulk - Regular Carrier Route	35	30,202	1,414	9	1,098	244	2,252	6,703
Bulk - Regular Other	546	66,400	11,716	36	2,284	776	9,430	37,124
Bulk - Non Profit Carrier Route	27	3,474	301	1	178	1	305	1,388
Bulk - Non Profit Other	63	14,489	1,816	14	503	31	1,532	16,598
Parcels - Zone Rate	23	10,457	169	10	359	35	612	461
Bound Printed Matter	0	4,721	258	4	116	58	1,925	6
Special Rate	21	4,864	379	3	181	117	283	2
Library Rate	0	839	2	1	17	0	77	1
USPS	21	2,667	522	1	147	311	11,970	1,481
Free for Blind/Handicapped	0	723	1	0	16	0	214	1
International	1	2,717	369	3	71	243	999	680
Registry	0	1,308	358	8	305	1,851	13	62
Certified	0	2,006	0	0	498	2,016	0	0
Insurance	0	116	0	0	15	0	0	0
COD	0	317	0	0	45	63	0	0
Special Delivery	0	0	0	0	10	150	0	0
Special Handling	0	0	0	0	0	0	0	0
Other Special Services	0	1,973	292	0	757	2,976	11,358	37
<b>Total</b>	<b>1,946</b>	<b>427,688</b>	<b>103,941</b>	<b>1,441</b>	<b>19,512</b>	<b>16,292</b>	<b>229,618</b>	<b>98,430</b>

## Attachment 1 -- Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	MAILGRAM	Registry	REWRAP	1Bulk pr	1CancMPP	1EEQMT	1MISC	1OPbulk
Letters and Parcels	0	1,806	6,324	2,093	157,064	15,100	51,997	51,523
Presort Letters and Parcels	0	8	183	3,740	6,200	3,386	8,964	10,954
Postal Cards	0	0	246	0	64	10	27	0
Private Mailing Cards	0	44	725	58	3,758	440	1,780	625
Presort Cards	0	0	0	222	205	110	642	293
Priority	0	310	1,638	310	6,494	1,986	5,763	7,270
Express	0	416	0	7	177	563	1,137	370
Mailgrams	0	0	0	0	0	0	1	0
Within County	0	0	1	3	12	319	105	165
Outside County - Regular	0	52	245	309	1,391	2,598	3,948	13,107
Outside County - Non Profit	0	1	8	16	132	404	800	1,626
Outside County - Classroom	0	0	1	1	4	27	40	591
Third Single Piece Rate	0	1	201	162	999	271	699	2,290
Bulk - Regular Carrier Route	0	3	13	412	757	1,294	1,738	17,563
Bulk - Regular Other	0	39	1,816	541	2,793	7,604	13,510	96,253
Bulk - Non Profit Carrier Route	0	0	0	12	87	190	234	2,734
Bulk - Non Profit Other	0	5	26	449	1,194	1,685	4,069	21,620
Parcels - Zone Rate	255	35	3	16	918	774	759	2,024
Bound Printed Matter	0	7	1	77	160	262	356	1,905
Special Rate	0	65	0	9	167	135	188	1,021
Library Rate	0	0	0	3	190	53	69	136
USPS	0	339	6	4	1,501	217	986	157
Free for Blind/Handicapped	0	0	0	2	172	220	82	2
International	0	324	807	20	2,014	827	3,329	941
Registry	39	15,586	0	4	15	420	571	14
Certified	0	80	0	0	0	54	79	0
Insurance	0	0	0	0	0	1	0	0
COD	0	0	0	0	0	5	2	0
Special Delivery	0	0	0	0	0	2	2	0
Special Handling	0	0	0	0	0	1	2	0
Other Special Services	0	300	2	0	1,689	251	858	284
<b>Total</b>	<b>293</b>	<b>19,423</b>	<b>12,245</b>	<b>8,470</b>	<b>188,155</b>	<b>39,210</b>	<b>102,738</b>	<b>233,465</b>

## Attachment 1 -- Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	1OPpref	1Platfrm	1POUCHN	1SackS_h	1SackS_m	1SCAN	1SUPPORT	Total MODS
Letters and Parcels	240,437	233,887	181,209	20,650	8,601	17,908	54,177	3,853,428
Presort Letters and Parcels	66,163	54,141	42,597	6,979	1,510	5,789	10,440	847,876
Postal Cards	90	122	373	0	0	0	33	2,279
Private Mailing Cards	3,423	2,986	2,731	425	9	54	1,565	111,759
Presort Cards	836	1,295	1,616	0	1	0	400	28,722
Priority	40,602	87,828	26,827	14,743	3,488	17,194	5,886	410,545
Express	1,942	9,657	2,694	1,279	40	3,367	1,116	63,759
Mailgrams	0	0	0	0	0	0	1	74
Within County	790	926	235	664	40	3	163	10,019
Outside County - Regular	53,230	51,209	17,921	12,002	7,716	1,063	4,734	354,180
Outside County - Non Profit	8,524	7,466	3,700	2,395	2,765	17	765	62,865
Outside County - Classroom	433	459	349	22	27	1	48	3,459
Third Single Piece Rate	2,980	4,676	1,834	509	125	141	658	54,289
Bulk - Regular Carrier Route	14,286	22,667	5,039	4,691	2,708	493	1,933	169,158
Bulk - Regular Other	64,214	88,888	49,607	13,192	10,098	1,056	15,241	1,107,144
Bulk - Non Profit Carrier Route	684	1,564	390	560	307	11	212	19,735
Bulk - Non Profit Other	19,041	18,136	7,424	2,784	2,353	87	3,947	287,307
Parcels - Zone Rate	3,211	24,416	2,141	3,530	2,919	48	920	64,010
Bound Printed Matter	2,437	6,171	928	785	484	241	319	28,853
Special Rate	1,219	5,623	1,025	620	797	4	225	21,407
Library Rate	515	1,154	944	258	1	4	82	6,156
USPS	4,331	5,510	2,276	740	3	42	837	56,288
Free for Blind/Handicapped	1,238	1,276	794	267	0	2	99	7,399
International	4,992	16,277	9,916	1,815	3,335	339	2,691	172,779
Registry	517	416	229	0	14	183	416	27,072
Certified	0	53	0	0	0	0	118	5,695
Insurance	0	0	0	0	0	0	0	133
COD	0	0	0	0	0	0	78	510
Special Delivery	0	44	0	0	0	0	5	243
Special Handling	43	0	0	31	0	0	3	84
Other Special Services	516	411	235	76	0	59	753	47,096
Total	536,694	647,257	363,035	89,017	47,342	48,110	107,865	7,824,323

Attachment 1 – Response to OCA/USPS-T12-14

FY96 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	BMC Cost Pools						Total BMC	Non-MODS
	NMO	OTHR	PLA	PSM	SPB	SSM		
Letters and Parcels	1	1,948	498	553	942	110	4,051	794,125
Presort Letters and Parcels	2	0	201	0	605	108	917	214,436
Postal Cards	0	0	0	0	0	0	0	935
Private Mailing Cards	0	93	14	0	0	0	107	24,847
Presort Cards	0	0	0	0	0	0	0	7,707
Priority	83	599	330	343	79	1	1,436	65,920
Express	0	0	19	0	0	0	19	20,558
Mailgrams	0	0	0	0	0	0	0	0
Within County	0	20	35	0	27	12	95	5,045
Outside County - Regular	503	3,720	5,499	118	1,522	4,545	15,906	91,108
Outside County - Non Profit	2	856	1,326	2	571	727	3,483	14,265
Outside County - Classroom	2	414	325	0	8	113	863	1,311
Third Single Piece Rate	70	4,208	2,310	2,311	1,612	383	10,893	12,912
Bulk - Regular Carrier Route	415	5,437	5,151	677	1,871	2,679	16,230	80,272
Bulk - Regular Other	4,377	42,940	27,739	23,113	23,165	11,829	133,164	299,550
Bulk - Non Profit Carrier Route	65	658	374	75	141	124	1,437	7,710
Bulk - Non Profit Other	538	7,149	3,509	1,352	4,338	1,813	18,696	60,700
Parcels - Zone Rate	8,250	23,992	21,154	12,329	3,752	3,529	73,005	19,634
Bound Printed Matter	1,308	9,133	8,377	10,500	1,316	815	31,450	12,908
Special Rate	1,086	9,737	7,458	15,578	1,917	1,422	37,199	8,471
Library Rate	1,215	1,951	1,986	2,332	315	353	8,151	1,758
USPS	839	1,009	1,197	377	518	205	4,145	17,070
Free for Blind/Handicapped	1	595	278	560	455	0	1,889	726
International	887	10,622	5,659	5,434	3,393	1,719	27,715	6,461
Registry	0	105	25	0	36	0	166	14,973
Certified	0	0	0	0	0	0	0	12,789
Insurance	0	8	0	0	0	0	8	630
COD	0	0	0	0	0	0	0	1,307
Special Delivery	0	0	0	0	0	0	0	0
Special Handling	0	0	0	0	0	0	0	115
Other Special Services	0	84	6	43	0	0	133	28,806
<b>Total</b>	<b>19,642</b>	<b>125,277</b>	<b>93,468</b>	<b>75,698</b>	<b>46,583</b>	<b>30,488</b>	<b>391,158</b>	<b>1,827,048</b>

FY98 Volume-Variable Mail Processing Costs  
Letter/card shape assignment corrected

Subclass or Special Service	Grand Total C1	Table 5	
		USPS-T-12 C2	% Difference (C1-C2)/C2
Letters and Parcels	4,651,604	4,655,673	-0.09%
Presort Letters and Parcels	1,063,229	1,063,505	-0.03%
Postal Cards	3,215	3,062	5.00%
Private Mailing Cards	136,714	133,288	2.57%
Presort Cards -	36,429	35,765	1.86%
Priority	477,900	477,893	0.00%
Express	84,336	84,370	-0.04%
Mailgrams	74	75	-1.33%
Within County	15,159	15,161	-0.01%
Outside County - Regular	461,194	461,201	0.00%
Outside County - Non Profit	80,614	80,618	0.00%
Outside County - Classroom	5,632	5,632	0.00%
Third Single Piece Rate	78,094	78,184	-0.12%
Bulk - Regular Carrier Route	265,660	265,772	-0.04%
Bulk - Regular Other	1,539,858	1,540,108	-0.02%
Bulk - Non Profit Carrier Route	28,882	28,895	-0.04%
Bulk - Non Profit Other	366,703	366,726	-0.01%
Parcels - Zone Rate	156,649	156,650	0.00%
Bound Printed Matter	73,211	73,210	0.00%
Special Rate	67,077	67,076	0.00%
Library Rate	16,065	16,065	0.00%
USPS	77,503	77,044	0.60%
Free for Blind/Handicapped	10,014	10,022	-0.08%
International	208,955	206,773	0.09%
Registry	42,211	42,211	0.00%
Certified	18,483	18,484	-0.01%
Insurance	771	771	0.00%
COD	1,817	1,817	0.00%
Special Delivery	243	243	0.00%
Special Handling	199	199	0.00%
Other Special Services	76,035	76,036	0.00%
<b>Total</b>	<b>10,042,528</b>	<b>10,042,529</b>	<b>0.00%</b>

Response of United States Postal Service Witness Degen  
to Interrogatories of Office of the Consumer Advocate

OCA/USPS-T12-15. Please refer to lines 178-179 of program BMC1, H-23. These lines contain the following SAS statement:

```
IF 'B'<=F133<='E' OR F133='M' THEN HANDLING = ' PC_CRD';  
ELSE HANDLING = ' PC_LTR';
```

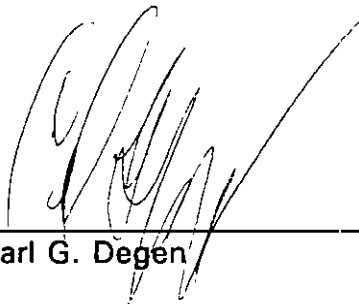
- a. Please explain why it is not necessary to check for values of F9635 for BMC tallies in order to assign a value to the variable HANDLING.
- b. Please confirm that this code will assign the value of 'PC\_LTR' to the variable HANDLING for all BMC single piece card tallies received after June 30, 1996. If you do not confirm, please explain how the value of HANDLING would be assigned for activity code 1020 (F262=1020), F133=' ', and F9635='B'.

OCA/USPS-T12-15 Response.

- a. The value of F9635 should be checked to properly deal with tallies received after June 30, 1996. Please see the response to OCA/USPS-T12-14, part (d) for the correction.
- b. Confirmed.

**DECLARATION**


I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Carl G. Degen

Date: 8-8-97

## 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.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
August 8, 1997