

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

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. NEEDHAM
(OCA/USPS-T39-8-18)
August 11, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T39-8. Please refer to the Lotus 1-2-3 spreadsheet file, "Pobox.wk3," and to cell "AE79," which shows the figure, 1,529, and contains the formula:

$= (1651 / 110370) * AE82$.

- a. Please provide a source for, or the derivation of, the figure 110,370 in the formula in cell AE79. Please show all calculations and provide citations to all figures used.
- b. Please confirm that the figure 1651 in the formula in cell AE79 is computed as follows: $1651 = (1507 / 100770) * 110370$, where 1507 is the "Before Rates" number of caller service customers in Group 1A, and 100,770 is the "Before Rates" total number of caller service customers from Appendix D, Schedule 3, page 17, of PRC Op. MC96-3. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to all figures used.

OCA/USPS-T39-9. Please refer to the Lotus 1-2-3 spreadsheet file, "Pobox.wk3," and to cell "AI79," which shows the figure, 1,355, and contains the formula:

$= (1445 / 96592) * AI82$. Please provide a source for, or the derivation of, the figure 96592. Please show all calculations and provide citations to all figures used.

OCA/USPS-T39-10. Please refer to the Lotus 1-2-3 spreadsheet file, "Pobox.wk3," and to cell "AO87," which shows the "Grand Total" of before-rates revenues for post office boxes, caller service and reserve numbers of \$616,535,639. Also, please refer to USPS-T-24, Table 9B., and the "Grand Total" in the column "TYBR Revenues" of

\$616,519,399. Please confirm that the difference between the figure in the file, "Pobox.wk3," and Table 9B., is due to rounding.

- a. If you do not confirm, please provide the correct figure. Please show all calculations and provide citations to all figures used.
- b. If you do confirm, please indicate which of the two Grand Total before-rates revenue figures should be relied upon.

OCA/USPS-T39-11. Please refer to the Lotus 1-2-3 spreadsheet file, "Pobox.wk3," and to cell "AS87," which shows the "Grand Total" of after rates revenues for post office boxes, caller service and reserve numbers of \$688,001,329. Also, please refer to USPS-T-24, Table 9B., and the "Grand Total" in the column "TYAR Revenues" of \$688,001,947. Please confirm that the difference between the figure in the file, "Pobox.wk3," and Table 9B., is due to rounding.

- a. If you do not confirm, please provide the correct figure. Please show all calculations and provide citations to all figures used.
- b. If you do confirm, please indicate which of the two Grand Total after-rates revenue figures should be relied upon.

OCA/USPS-T39-12. Please refer to your testimony at page 31, lines 12-14. Please confirm that "W/P 5" of USPS-T-39 was filed in electronic format.

- a. If you do not confirm, please provide "W/P 5" in electronic format.
- b. If you do confirm that "W/P 5" was filed in electronic format, please provide the file names associated with "W/P 5."

- c. Please provide the file names associated with Workpapers 1-4, and Workpapers 6-17.

OCA/USPS-T39-13. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

- a. Please confirm that the total number of Certified Mail transactions for FY 1996 is 269,730,120. If you do not confirm, please explain.
- b. Please confirm that the figure in part a. above consists of basic Certified Mail transactions only. If you do not confirm, please explain.
- c. Please confirm that the total revenue for Certified Mail for FY 1996 is \$292,900,039. If you do not confirm, please explain.
- d. Please confirm that the figure in part c. above consists of revenues from basic Certified Mail transactions only. If you do not confirm, please explain.
- e. Please explain the treatment of the ancillary service revenues for Certified Mail from Return Receipt of \$248,225,566, and Restricted Delivery of \$9,799,285.

OCA/USPS-T39-14. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

- a. Please confirm that fiscal year 1996 is the "base year" in Docket No. R97-1. If you do not confirm, please explain.
- b. Please provide a source for, or show the derivation of, the "Base Year" figure, 270.832, in cell "W23." Please show all calculations and provide citations to all figures used.
- c. Please confirm that the "Base Year" figure in part b. above consists of basic Certified Mail transactions only. If you do not confirm, please explain.

- d. Please reconcile the figure in part b. above with the total number of basic Certified Mail transactions of 269,730,120 in cell "O40." Please show all calculations and provide citations to all figures used.

OCA/USPS-T39-15. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

- a. Please confirm that the TYBR volume is 304,153,000. If you do not confirm, please explain.
- b. Please confirm that the TYBR figure in part a. above consists of basic Certified Mail transactions only. If you do not confirm, please explain.
- c. Please confirm that the TYAR volume is 293,118,000 (see USPS-T-6 at page 190). If you do not confirm, please explain.
- d. Please confirm that the TYAR figure in part c. above consists of basic Certified Mail transactions only. If you do not confirm, please explain.
- e. Please refer to cell "W21," which shows the figure, 286.578, and contains the following formula: $=293.118-+3.071-3.469069$. Please provide sources for, or the derivation of, the figures 3.071 and 3.469069. Please show all calculations and provide citations to all figures used.
- f. Please refer to cell "W21," which shows the figure, 286.578, and contains the following formula: $=293.118-+3.071-3.469069$. Please explain the reason for the "-+" in the formula.

OCA/USPS-T39-16. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

- a. Please refer to cell "BF23," which shows the figure, 283,148, and contains the formula: $=(((BB23/BB31))*BF31)-3430.362$. Please provide a source for, or the derivation of, the figure 3430.362. Please show all calculations and provide citations to all figures used.
- b. Please confirm that the figure 283,148, shown in cell BF23, consists of basic Certified Mail transactions only. If you do not confirm, please explain.
- c. Please explain the relationship between the figure 283,148, shown in cell BF23, and the figure 286,578, shown in cell BF31.

OCA/USPS-T39-17. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

- a. Please refer to cell "BP33," which shows the figure, 1.334002237, and contains the formula: $=BP31/328994$. Please provide a source for, or the derivation of, the figure 328994. Please show all calculations and provide citations to all figures used.
- b. Please explain the significance of the figure, 1.334002237, shown in cell "BP33."

OCA/USPS-T39-18. Please refer to the Lotus 1-2-3 spreadsheet file, "Certify.wk3."

Please explain the significance of the figure, 109,885, shown in cell "BP35."

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.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 11, 1997