

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 JOE ALEXANDROVICH
(OCA/USPS-T5-5-8)
August 13, 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.

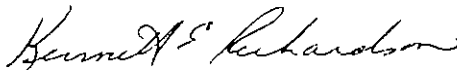
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



KENNETH E. RICHARDSON

Attorney

OCA/USPS-T5-5. The following interrogatory refers to Postal Service library reference H-6, data file "I.DAT" and your workpaper A-1, base year 1996, manual input requirement.

- a. Can the "I.DAT" data file provided on diskette in Postal Service library reference H-6, subdirectory "PS410D01/FY96MODS" be used in the Postal Services CRA roll-forward program to replicate workpaper A-1, manual input requirement for the base year 1996?
- b. If your response to part "a" of this interrogatory is negative, please indicate what Postal Service library reference and data file could be used to replicate the workpaper A-1, manual input requirement for the base year 1996.
- c. If no data file has been submitted on a diskette that could be used to replicate the workpaper A-1, manual input requirement for the base year 1996, please provide one. The data file provided on a diskette should be in a format similar to the file format used in the Postal Service library reference H-6 data file "I.DAT."

OCA/USPS-T5-6. The following interrogatory refers to Postal Service library reference H-4 at 62. Please confirm that op code 12 takes the sum of components 427 and 29 and distributes the total to component 528 on the basis of component 527. If you are unable to confirm, please explain fully and include cites.

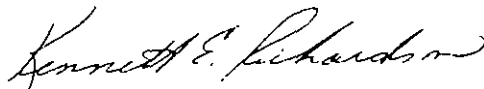
OCA/USPS-T5-7. Workpaper A-3, pages 4 through 14.1 indicates that many of the space and rental distribution key variabilities are either 70 or 80 percent. Please provide the derivation of each of the 70 and 80 variability percentages shown on those

pages. Include in each derivation cites to all source documents and the rationale for using each variability.

OCA/USPS-T5-8. Please refer to your workpaper A-3, Base Year 1996 Factor Report. State whether the capital amounts for equipment in column 1 on page 0.3 (used to calculate the capital factors) are the original equipment cost or the cost less depreciation.

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.

A handwritten signature in cursive script, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
August 13, 1997