

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
AUG 15 2 43 PM '97
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 PAUL M. LION
(OCA/USPS-T24-48-59)
August 15, 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.

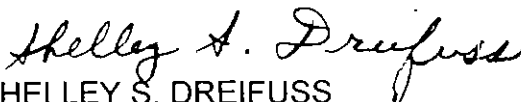
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-48. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery routes during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract routes during each of the past five fiscal years.

OCA/USPS-T24-49. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery routes by CAG during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract routes by CAG during each of the past five fiscal years.

OCA/USPS-T24-50. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery carriers during each of the past five fiscal years.
- b. Please provide the number of rural delivery and highway contract carriers during each of the past five fiscal years.

OCA/USPS-T24-51. Please refer to your testimony at page 1, lines 17-22.

- a. Please provide the number of city delivery carriers by CAG during each of the past five fiscal years.
- b. Please provide the number of rural delivery carriers by CAG during each of the past five fiscal years.

OCA/USPS-T24-52. Please refer to your testimony at page 1, lines 17-22.

- a. Please define city delivery.
- b. Please define rural delivery.
- c. Please describe the features that distinguish a city delivery route from a rural delivery route and a rural delivery route from a city delivery route.

OCA/USPS-T24-53. Please refer to your testimony at page 1, lines 17-22.

- a. Please define highway contract delivery.
- b. Please confirm that highway contract delivery is a form of rural carrier delivery. If you do not confirm, please explain.
- c. Please confirm that the costs of highway contract delivery are contained in Cost Segment 10. If you do not confirm, please explain.

OCA/USPS-T24-54. Please refer to your testimony at page 1, lines 17-22.

- a. Please explain how the Postal Service determines whether postal customers receive city or rural delivery service. Please identify and explain all factors in making this determination.
- b. Please identify the final decision authority for determining whether postal customers receive city or rural delivery service.
- c. Please provide, and file as a library reference, any guidelines, manuals or other documents that assist in the determination whether postal customers shall receive city or rural delivery service.

OCA/USPS-T24-55. Please refer to your testimony at page 1, lines 17-22.

- a. Please explain how the Postal Service determines where to locate new post offices to serve postal customers. Please identify and explain all factors in making this determination.
- b. Please explain how the Postal Service determines whether to expand an existing post office, or build a new post office, to service postal customers.
 - (i) Please identify and explain all factors in making this determination.
 - (ii) What role do mail volume and revenue play in determining whether to expand an existing post office.
- c. Please identify the final decision authority for determining whether to expand existing post offices, or build new post offices, to serve postal customers.
- d. Please provide, and file as a library reference, any guidelines, manuals or other documents that assist the final decision authority in determining whether to expand existing post offices, or build new post offices, to serve postal customers.

OCA/USPS-T24-56. Please refer to your testimony at page 1, lines 17-22, and the table below.

COST SEGMENT	1992	% Chg.	1993	% Chg.	1994	% Chg.	1995	% Chg.	1996
C/S 6&7	\$9,994,791	4.7%	\$10,460,864	5.6%	\$11,043,423	3.8%	\$11,462,483	0.0%	\$11,461,472
C/S 10	\$2,614,273	6.4%	\$2,780,993	9.4%	\$3,042,304	5.7%	\$3,216,823	5.0%	\$3,377,062

Source: CRA, FY 1992-96

- a. Please confirm that the figures for Cost Segment 6&7 and Cost Segment 10 are correct. If you do not confirm, please explain.
- b. Please confirm that rural carrier costs (C/S 10) are growing at a relatively faster rate than city carrier costs (C/S 6&7) during the fiscal years indicated. If you do not confirm, please explain.
- c. What explains the relatively faster growth of rural carrier costs than city carrier costs?

OCA/USPS-T24-57. Please refer to your testimony at page 1, lines 17-22.

- a. Please confirm that there are three types of "evaluated" routes for rural carriers: H Routes, J Routes, and K Routes. If you do not confirm, please explain.
- b. Please confirm that there are two types of "other" routes for rural carriers: Mileage (M) Routes, and Auxiliary (A) Routes. If you do not confirm, please explain.
- c. Please confirm that all "evaluated" routes and the auxiliary routes are designated as "L" routes and "Non-L" routes depending on rural box density.
- d. Please confirm that "L" routes have 12 or more boxes per mile and "Non-L" routes have fewer than 12 boxes per mile. If you do not confirm, please explain.
- e. Please confirm that "L" routes can be found in every CAG. If you do not confirm, please explain.
- f. Please confirm that "Non-L" routes can be found in every CAG. If you do not confirm, please explain.

- g. Please provide the number of "evaluated" and auxiliary routes designated as "L" routes and "Non-L" routes, and the percent of "L" routes and "Non-L" routes to the total number of routes, for each CAG during each of the past five fiscal years.

OCA/USPS-T24-58. Please refer to your testimony at page 1, lines 17-22.

- a. Please confirm that the number of K routes has increased as a percent of total rural routes, while H routes have decreased as a percent of the total, during each of the past five fiscal years. If you do not confirm, please explain.
- b. Please explain the reason for, and the significance of, the increase (if any) in the number of K routes as a percent of total rural routes.
- c. Also, please explain the reason for, and the significance of, the decrease (if any) in the number of H routes as a percent of total rural routes.

OCA/USPS-T24-59. Please refer to your response to OCA/USPS-T24-21, Table 13 of your testimony, and to LR-H-216.

- a. Please provide post office box space support, space provision and all other costs by CAG.
- b. Please confirm that file RENT.DATA of H-216 contains neither post office box space support costs nor all other attributable costs for post office boxes by CAG. If you do not confirm, please list the variables that provide these costs on the file RENT.DATA.

- c. Please confirm that file BOXES.DATA of H-216 contains neither post office box space support costs nor all other attributable costs for post office boxes by CAG. If you do not confirm, please list the variables that provide these costs on the file RENT.DATA.
- d. Your response to OCA/USPS-T24-21a states that the Table 13 attributable costs by CAG can be developed from the data in library reference H-216.
- i. Please explain how to develop the FY98 TYBR space support costs for post office boxes by CAG from the data contained in library reference H-216. If these costs cannot be produced from data in library reference H-216, please provide all necessary data to produce these cost estimates. Please include an explanation of how to use any data provided to produce these cost estimates.
- ii. Please explain how to develop the FY98 TYBR space provision costs for post office boxes by CAG from the data contained in library reference H-216. If these costs cannot be produced from data in library reference H-216, please provide all necessary data to produce these cost estimates. Please include an explanation of how to use any data provided to produce these cost estimates.
- iii. Please provide the attributable costs by Cost Segment that would be included in the cost category of "All Other" costs for the FY98 TYBR. Please explain how the attributable costs by Cost Segment in the "All Other" cost category can be developed for post office boxes by CAG from the H-216 data. If these costs cannot be produced from data in library

reference H-216, please provide all necessary data to produce these cost estimates. Please include an explanation of how to use any data provided to produce these cost estimates.

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 15, 1997