

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 RICHARD PATELUNAS  
(OCA/USPS-T15-2-4)  
August 18, 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-T15-2. Please refer to your response to OCA/USPS-T24-25 (redirected to you), and page 20, line 7 of USPS-T-24.

- a. Please confirm that the difference between the figure of \$104,575,000 for "All Other" costs in column [2] of the table in OCA/USPS-T24-25 and the figure of \$104,580,000 for "All Other" costs in USPS-T-24 is due to rounding. If you do not confirm, please explain.
- b. Please specify which of the two "All Other" cost figures -- \$104,575,000 or \$104,580,000 -- is the correct amount.
- c. If, in response to part b. above, you chose the figure, \$104,580,000, please provide the correct figure(s) for each Cost Segment in column [2] of the table in OCA/USPS-T24-25.

OCA/USPS-T15-3. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.

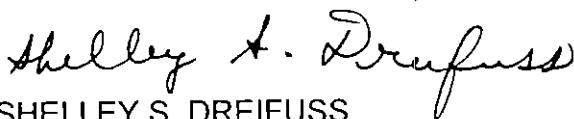
- a. Please confirm that the FY98 TYBR attributable cost of post office boxes is \$607,733,000. If you do not confirm, please explain.
- b. Please confirm that the TYBR attributable cost of caller service is included in the FY98 TYBR attributable cost of post office boxes. If you do not confirm, please explain.
- c. Please provide the FY98 TYBR attributable cost of caller service. Please show all calculations and provide citations to any figures used.

OCA/USPS-T15-4. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.

- a. Please confirm that TYBR attributable costs for post office boxes consist of three categories of cost: Space Support, Space Provision and All Other. If you do not confirm, please explain.
- b. Please provide the TYBR Space Support and All Other costs by CAG.

#### 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

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