

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 PAUL M. LION  
(OCA/USPS-T24-60-64)  
August 19, 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.

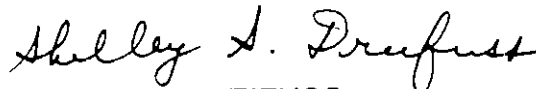
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-60. Please refer to your testimony at page 20, lines 5-7, concerning the total cost for each of the three cost categories of Space Support, Space Provision and All Other.

- a. Please confirm that you assumed there would be no change in total Space Support and total Space Provision costs in the test year associated with the decrease in the total number of post office boxes. If you do not confirm, please explain.
- b. Please confirm that only the total of All Other costs will vary with the decrease in the number of post office boxes in the test year. If you do not confirm, please explain.

OCA/USPS-T24-61. Please refer to your testimony at pages 26 and 27, Tables 12 and 13, as revised August 11, 1997. Please provide electronic files of the spreadsheets underlying Tables 12 and 13, as revised.

OCA/USPS-T24-62. Please refer to your response to OCA/USPS-T24-10.

- a. Please confirm that the total number of boxes installed (e.g., 14,290,298) is the same in Docket No R97-1 as in Docket No. MC96-3. If you do not confirm, please explain.
- b. For purposes of your testimony in Docket No. R97-1, please confirm that you could have defined delivery groups in terms of 5-digit ZIP Codes. If you do not confirm, please explain.

- c. Please explain the advantages and disadvantages of defining delivery groups in terms of finance number instead of in terms of 5-digit ZIP Codes.
- d. Table X in OCA/USPS-T24-10 shows the “Change in the Number of Post Office Boxes Installed by Box Size and Delivery Group.” Are delivery groups defined in terms of finance number “more correct” than delivery groups defined in terms of 5-digit ZIP Codes? Please explain your answer in full.
- e. Please refer to Table X. Please confirm that more post office box customers are paying Group B fees because delivery groups are defined in terms of finance number. If you do not confirm, please explain your answer in full.
- f. Please refer to Table X. Please confirm that more post office box customers are paying Group C fees because delivery groups are defined in terms of finance number. If you do not confirm, please explain your answer in full.
- g. Do costs change for post office boxes because delivery groups are defined in terms of finance number? Please explain your answer in full.

OCA/USPS-T24-63. Please refer to Table X in OCA/USPS-T24-10, and your response to that interrogatory.

- a. Please confirm that column [2] shows the net increase in the number of post office boxes in Group B paying higher fees. If you do not confirm, please explain.
- b. Please confirm that column [3] shows the net increase in the number of post office boxes in Group C paying higher fees. If you do not confirm, please explain


- c. Please provide a list of 5-digit ZIP Codes where post office boxes changed from one fee group to another.
- d. Please complete the table below so as to show box movement from delivery groups defined in terms of 5-digit ZIP Code to delivery groups defined in terms of finance numbers. [Example: an entry of 5 in row 3, column 1 means that 5 boxes moved from group "1-A" to group "City-other."]

Finance Number	DELIVERY GROUPS				
	I-A	I-B	ZIP Code I-C	II	III
City-A					
City-B					
City-other					
Noncity					
Nondelivery					

OCA/USPS-T24-64. Please refer to Table X in OCA/USPS-T24-10, and your response to that interrogatory. Please confirm that defining delivery groups in terms of finance number as opposed to 5-digit ZIP Code results in more post office boxes experiencing fee increases than intended by the Commission in its opinion and recommended decision in Docket No. MC96-3. If you do not confirm, please explain your answer in full.

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 19, 1997