

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T24-37)

The United States Postal Service hereby provides the response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T24-37, filed on August 5, 1997, and redirected from witness Lion.

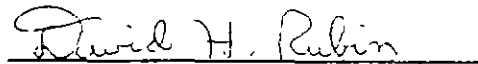
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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August 19, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY
OF THE OFFICE OF THE CONSUMER ADVOCATE
(REDIRECTED FROM WITNESS LION)

OCA/USPS-T24-37. Please refer to the excel file "caller service," sheet "Key Parameters," and footnote (5) in LR-H-107, which refers to "USPS LR-SSR-104."

- a. Please confirm that the "Total Number of Firms or Callers" from USPS LR-SSR-104 is 43,305. If you do not confirm, please explain.
- b. Please provide the source for the figure, 44,045, the "Total Number of Firms or Callers" from LR-H-107.
- c. Please explain the discrepancy between the figure, 44,045, the "Total Number of Firms or Callers" from LR-H-107, and the figure from part a. above.

RESPONSE:

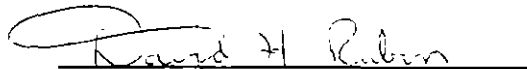
a. Confirmed

b. & c.

In response to the errata to witness Lion's number of caller service separations (USPS-T-24, Table 9B), filed on August 14, 1997, the "Total Number of Firms or Callers" in LR-H-107 will be revised to 39,115. This figure is less than the 43,435 in LR-SSR-104 because of the impact of the Docket No. MC96-3 caller service fee change for some Group D customers. As will be shown in a revised footnote 5 on page 10 of LR-H-107, the 39,115 is not taken from LR-SSR-104, but instead is calculated by dividing witness Lion's revised number of separations by the number of separations per caller in LR-H-207.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

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August 19, 1997