

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 SHARON DANIEL  
(OCA/USPS-T29-1-3)  
August 22, 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



EMMETT RAND COSTICH

Assistant Director

Office of the Consumer Advocate

OCA/USPS-T29-1. Please refer to USPS-29C. Please provide citations to page and line number for each of the footnotes in that exhibit. If you are referring to a spreadsheet, please provide the sheet name, row and column.

OCA/USPS-T29-2. Please refer to Appendices I and III, page 43, footnotes 1-4.

- a. Please confirm that in each formula in footnotes 2-4 the operation should be division and not multiplication. If you do not confirm, please explain fully.
- b. Please fully define the term "Realization Factor" and explain its significance to your analysis. What is the economic interpretation of this term?
- c. Please provide the sources for the "Realization Factor" of 85 percent and each of the "Volume Variability" figures in the footnotes.
- d. Would the substitution of 100 for each of the volume variability figures on those pages result in unit cost estimates comparable to those obtained in MC95-1. Please explain fully.

OCA/USPS-T29-3. Please refer to your exhibits 29A and 29B, page 2.

- a. Please define fully the terms "Total," "Proportional," and "Fixed."
- b. Please provide the citations to spreadsheet title, column and row of Library Reference H-106 for each of the numbers on these pages. If these numbers are calculated, please show all calculations.

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.

  
EMMETT RAND COSTICH  
Attorney

Washington, D.C. 20268-0001  
August 22, 1997