

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 WITNESS PATELUNAS TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T15-1)

The United States Postal Service hereby provides the responses of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T15-1, filed on August 8, 1997.

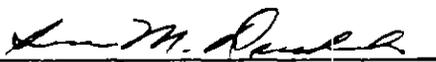
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

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August 22, 1997

Response of United States Postal Service Witness Patelunas
to Interrogatories of
Office of Consumer Advocate

OCA/USPS-T-15-1. The following table was taken from USPS-15D and USPS-15J. Columns 1, 2, and 4 were taken directly from your exhibits. Column 3 is the sum of columns 1 and 2 and column 5 is the difference between column 3 and column 4. Please explain the differences in column 5. If any of these numbers are incorrect, please indicate which ones and correct them. If any of these comparisons are incorrect, please so indicate and provide the correct comparisons.

USPS-15D

CS	1 Volume Variable Total	2 All Other Costs	3 Sum 1 and 2	4 Accrued Costs	5 Difference
1	304,591	1,364,345	1,668,936	1,668,936	0
2	1,597,625	1,479,466	3,077,091	3,355,519	278,428
3	12,102,896	1,626,043	13,728,939	17,062,705	3,333,766
4	4,215	5,508	9,723	9,723	0
6	3,320,557	396,794	3,717,351	3,717,351	0
7	2,302,729	5,751,447	8,054,176	8,098,978	44,802
8	264,334	169,125	433,459	433,459	0
9	57,773	51,918	109,691	109,691	0
10	1,608,020	1,967,815	3,575,835	3,575,835	0
11	1,379,577	809,352	2,188,929	2,188,929	0
12	163,064	456,250	619,314	619,314	0
13	7,405	271,664	279,069	279,069	0
14	3,564,763	547,923	4,112,686	4,112,686	0
15	897,379	514,856	1,412,235	1,412,235	0
16	1,151,297	1,555,786	2,707,083	2,707,083	0
17	-	54,211	54,211	54,211	0
18	1,704,692	2,461,626	4,166,318	4,166,318	0
19	-	36,405	36,405	36,405	0
20	2,068,563	1,578,740	3,647,303	3,647,303	0
Total	32,499,480	21,099,274	53,598,754	57,255,750	3,656,996

Response of United States Postal Service Witness Patelunas
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USPS-15J

CS	1 Volume Variable Total	2 All Other Costs	3 Sum 1 and 2	4 Accrued Costs	5 Difference
1	318,667	1,393,948	1,712,615	1,712,615	0
2	1,696,664	1,533,270	3,229,934	3,517,945	288,011
3	12,664,607	1,678,820	14,343,427	17,759,605	3,416,178
4	4,422	5,651	10,073	10,073	0
6	3,151,899	407,192	3,559,091	3,559,091	0
7	2,374,474	5,943,399	8,317,873	8,401,441	88,568
8	276,306	172,666	448,972	448,972	0
9	61,039	53,072	114,111	114,111	0
10	1,674,475	2,047,129	3,721,604	3,721,604	0
11	1,480,469	835,248	2,315,717	2,315,717	0
12	171,494	476,500	647,994	647,994	0
13	7,904	283,721	291,625	291,625	0
14	3,760,945	565,577	4,326,522	4,326,522	0
15	950,339	590,346	1,540,685	1,540,685	0
16	1,529,270	2,002,125	3,531,395	3,531,395	0
17	-	57,201	57,201	57,201	0
18	1,834,863	2,760,838	4,595,701	4,595,701	0
19	-	38,973	38,973	38,973	0
20	2,302,512	1,796,339	4,098,851	4,098,851	0
Total	32,260,349	22,642,015	56,902,364	60,690,121	3,787,757

OCA/USPS-T15-1 Response:

Please see my revisions to Exhibits USPS-15D and USPS-15J filed on August 18, 1997 and August 22, 1997.

DECLARATION

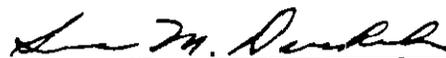
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Richard Patelunas", written over a horizontal line.

Dated: 8/22/97

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.



Susan M. Duchek

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August 22, 1997