

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(DFC/USPS-T5-1-3)

August 25, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Joe Alexandrovich.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Frank (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: August 25, 1997



DOUGLAS F. CARLSON

DFC/USPS-T5-1. Please refer to Exhibit USPS-5C at 15. Please explain why the revenue per piece for single-piece cards, 20.5 cents, is higher than the rate, 20 cents.

DFC/USPS-T5-2.

a. Please provide the Base Year 1996 per-piece revenue and per-piece volume-variable costs for stamped cards. Please specify whether these costs include the manufacturing costs of the cards.

b. If the information requested in part (a) is not available for Base Year 1996, please provide the information for the most-recent period for which it is available.

c. If the information requested in part (a) is not available for Base Year 1996, please explain all reasons why the Postal Service stopped collecting data for stamped cards separately from all single-piece cards. In addition, provide all documents that direct or explain this change in reporting. (Please note my definition of "documents," which is provided in my interrogatories to witness Fronk (DFC/USPS-T32-1-7).)

DFC/USPS-T5-3. Please refer to your testimony at page 6, lines 18-21, and page 7, lines 1-3.

a. Please explain all reasons why the "distinction between Postal Cards and Private Postcards" was eliminated in the base year. In addition, provide all documents that direct or explain this change. (Please note my definition of "documents," which is provided in my interrogatories to witness Fronk (DFC/USPS-T32-1-7).)

b. Please identify, define, and explain the purpose of all data-collection systems that were "modified to combine these categories into a single line item designated as Single Piece Cards."

c. Please identify, define, and explain the purpose of all data-collection systems that were not "modified to combine these categories into a single line item designated as Single Piece Cards."

d. Please provide all examples in the past five years of a distinction between the costs for two types of mail or services having been eliminated even though the two types of mail or services had significantly different cost characteristics.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

August 25, 1997
Emeryville, California