

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RICHARD PATELUNAS
(DFC/USPS-T15-1-4)

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 Richard Patelunas.

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-T15-1. Please provide the Fiscal Year 1997 per-piece revenue and per-piece volume-variable costs for stamped cards. Please specify whether these costs include the manufacturing costs of the cards.

DFC/USPS-T15-2. Please provide the Test Year 1998 per-piece revenue and per-piece volume-variable costs for stamped cards. Please specify whether these costs include the manufacturing costs of the cards.

DFC/USPS-T15-3. Please provide Test Year 1998 per-piece revenue and per-piece volume-variable costs for return receipt and return receipt for merchandise. Also, please provide a citation to the precise location in your testimony where this information is located.

DFC/USPS-T15-4. Please explain, with references to your testimony, all reasons why First-Class Mail single-piece cards have a lower volume-variable cost than First-Class Mail letters. Are there any reasons why, or cost segments in which, First-Class Mail single-piece cards have higher volume-variable costs than First-Class Mail letters? If yes, please explain.

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