

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 PAUL M. LION
(OCA/USPS-T24-68-72)
September 2, 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



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-68. Please refer to your testimony at page 20, line 5, and the following table, which shows the development of attributable "Space Support" costs.

FY98 TYBR ACCRUED AND ATTRIBUTABLE SPACE
SUPPORT COSTS 1/

COST SEGMENT AND COMPONENT	TOTAL ACCRUED (\$1,000)	ATTRIBUTABLE TO POST OFFICE BOXES (\$1,000)
	[1]	[2]
C/S 11.1.1 Cleaning and Protection	\$802,065	\$70,977
C/S 11.1.2 Contract Cleaners	\$53,401	\$4,726
C/S 11.3 Plant & Building Equipment Maintenance	\$389,346	\$34,454
C/S 15.2 Building Occupancy, Fuel and Utilities	\$428,502	\$37,919
C/S 16.3.1 Custodial & Building	\$1,407,999	\$124,598
C/S 18.1.2 Postal Inspection Service	\$360,277	\$7,254
TOTAL SPACE SUPPORT	\$3,441,590	\$279,928

Notes and Sources

1/ USPS-T-15, WP E, Table D, for the cost segments listed.

- a. Please confirm that the figures in column [1] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.
- b. Please confirm that the figures in column [2] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.

OCA/USPS-T24-69. Please refer to your testimony at page 20, line 7, "All Other" costs.

- a. For Cost Segments 6 & 7, city delivery carriers, please confirm that the figure, \$353,000, post office box attributable costs, is obtained by summing \$259,000 (Component 6.1, In-Office Direct Labor), \$49,000 (Component 6.2, In-Office Support), and \$45,000 (Component 7.5, Street Support). If you do not confirm, please explain and provide the correct figures.
- b. Please describe, for post office boxes, the tasks and activities performed under Components 6.1, 6.2 and 7.5.
- c. Please confirm that highway contract carriers engage in the same tasks and activities described in part b. above. If you do not confirm, please explain.
- d. Please confirm that the cost of highway contract carriers (Cost Segment 14) is not an attributable cost of post office boxes. If you do not confirm, please explain.
- e. Please explain why the tasks or activities giving rise to costs of highway contract carriers that are similar or identical to the costs of city delivery carriers are not included in post office box attributable costs.

OCA/USPS-T24-70. Please refer to your testimony at page 4, lines 2-3, concerning the POB Survey, and Tables 1 and 2.

- a. Please confirm that the POB Survey obtained data on the number of post office boxes installed and in use by surveying "contract postal units" (herein contract

- stations). See Glossary of Postal Terms, Publication 32, April 1988, at 15. If you do not confirm, please explain.
- b. In the POB Survey, what percent of the 32,436 postal facilities surveyed were contract stations?
 - c. In the POB Survey, what percent of the 25,591 returned survey forms were contract stations?
 - d. In the POB Survey, what percent of the 14,290, 298 post office boxes installed are located in contract stations?
 - i. Please provide the number of post office boxes installed in contract stations in the same format as Table 1.
 - ii. Please provide the number of post office boxes installed in contract stations by CAG by box size.
 - e. In the POB Survey, what percent of the 11,319,936 post office boxes in use are located in contract stations.
 - i. Please provide the number of post office boxes in use in contract stations in the same format as Table 1.
 - ii. Please provide the number of post office boxes in use in contract stations by CAG by box size.

OCA/USPS-T24-71. Please refer to LR-H-188.

- a. Please confirm that the Delivery Statistics File (DSF) contains data on the number of contract stations having post office boxes. If you do not confirm, please explain.

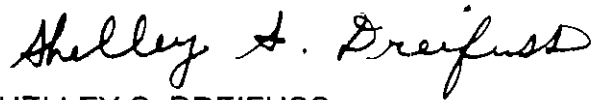
- b. Please confirm that the Delivery Statistics File (DSF) contains data on the number of post office boxes located in contract stations. If you do not confirm, please explain.
- c. Please provide, and explain how to identify from the data, the number of contract stations having post office boxes.
- d. Please provide, and explain how to identify from the data, the number of post office boxes located in contract stations.
- e. Please provide, and file as a library reference, a file containing data on contract stations, including the number of contract stations, the number of boxes by station by box size, and Postal Service payments to contractors for contract stations.

OCA/USPS-T24-72. Please refer to your response to OCA/USPS-T24-23e, where it states that "Migration of general delivery or other customers to Group E boxes would not, however, affect the revenue estimation for post office boxes . . ."

- a. Please confirm that migration of general delivery or other customers to Group E boxes would increase the cost of operating Group E boxes. If you do not confirm, please explain your answer in full.
- b. Please provide an estimate of the additional cost of operating Group E boxes resulting from the migration of general delivery or other customers to Group E boxes.
- c. Please confirm that service to general delivery customers is more costly than box service to post office boxholders. If you do not confirm, please explain.

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.



SHELLEY S. DREIFUSS
Attorney

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