

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
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T15-2-4)

The United States Postal Service hereby provides the responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T15-2-4, filed on August 18, 1997.

Each 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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September 2, 1997

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

OCA/USPS-T-15-2. Please refer to your response to OCA/USPS-T24-25 (redirected to you), and page 20, line 7 of USPS-T-24.

- a. Please confirm that the difference between the figure of \$104,575,000 for "All Other" costs in column [2] of the table in OCA/USPS-T24-25 and the figure of \$104,580,000 for "All Other" costs in USPS-T-24 is due to rounding. If you do not confirm, please explain.
- b. Please specify which of the two "All Other" cost figures - \$104,575,000 or \$104,580,000 -- is the correct amount.
- c. If, in response to part b. above, you chose the figure, \$104,580,000, please provide the correct figure(s) for each Cost Segment in column [2] of the table in OCA/USPS-T24-25.

OCA/USPS-T-15-2 Response:

- a. I cannot say why USPS-T-24 is different, it may be due to rounding. Whatever the reason, \$5,000 out of more than \$104 million is insignificant.
- b. As I confirmed in my response to OCA/USPS-T24-25, the \$104,575 is correct.
- c. Not Applicable.

Response of United States Postal Service Witness Patelunas
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OCA/USPS-T-15-3. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.

- a. Please confirm that the FY98 TYBR attributable cost of post office boxes is \$607,733,000. If you do not confirm, please explain.
- b. Please confirm that the TYBR attributable cost of caller service is included in the FY98 TYBR attributable cost of post office boxes. If you do not confirm, please explain.
- c. Please provide the FY98 TYBR attributable cost of caller service. Please show all calculations and provide citations to any figures used.

OCA/USPS-T-15-3 Response:

- a. *Part a is confirmed.*
- b. *Part b is confirmed.*
- c. The FY98 TYBR attributable cost for caller service is included in the FY98 TYBR attributable cost of post office boxes and it cannot be isolated.

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

OCA/USPS-T-15-4. Please refer to USPS-T-15, WP E, Table D at 8, concerning the TYBR attributable costs of post office boxes.


- a. Please confirm that TYBR attributable costs for post office boxes consist of three categories of cost: Space Support, Space Provision and All Other. If you do not confirm, please explain.
- b. Please provide the TYBR Space Support and All Other costs by CAG.

OCA/USPS-T-15-4 Response:

- a. It is confirmed that these are the TYBR attributable cost categories of post office boxes used by Witness Lion, USPS-T-24.
- b. This is not available.

DECLARATION

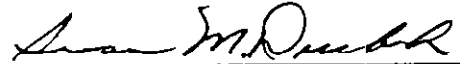
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

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

Dated: 9/2/97

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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