

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  
REDIRECTED FROM WITNESS LION  
(OCA/USPS-T24-60(b))

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T24-60(b), filed on August 18, 1997, and redirected from witness Lion.

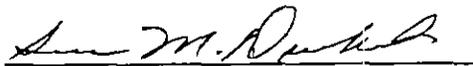
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Susan M. Duchek

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September 2, 1997

Answer of Richard Patelunas to the Interrogatories of  
Office of the Consumer Advocate  
to United States Postal Service  
(Redirected from Witness Lion USPS-T24)

OCA/USPS-T24-60. Please refer to your testimony at page 20, lines 5-7, concerning the total cost for each of the three cost categories of Space Support, Space Provision and All Other

a. Please confirm that you assumed there would be no change in total Space Support and total Space Provision costs in the test year associated with the decrease in the total number of post office boxes. If you do not confirm, please explain.

b. Please confirm that only the total of All Other costs will vary with the decrease in the number of post office boxes in the test year. If you do not confirm, please explain.

OCA/USPS-T24-60 Response:

a. See Witness Lion's response.

b. Part b is not confirmed. In the rollforward, in addition to the mail volume effect for the components comprising the "All Other" category, the components that are used to build the distribution keys for the PESSA costs also receive a mail volume effect. As such, the Post Office Box portion (component 903), receives a mail volume effect that causes its portion of the total distribution key to change slightly. For instance, the following changes occurred from Base Year 1996 to Test Year After Rates 1998 for components 1099 (Total Key of Space Components) and 1199 (Total Key of Rental Value Components):

		<u>(1099)</u>	<u>(1199)</u>
BY96	USPS-T-5, WP-A-3, pp. 46 and 66	8.89%	9.67%
TY98AR	USPS-T-15, WP-G, Table B, pp. 46 and 66	8.81%	9.57%

DECLARATION

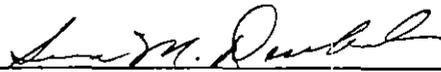
I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Richard Patelunas", is 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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