

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-T24-73-77)
September 5, 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.

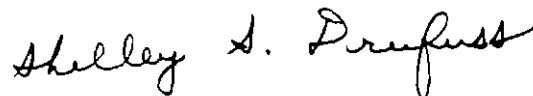
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-73. Please refer to your testimony at page 1, lines 17-22.

- a. Please confirm that "contract postal units" (herein contract stations) can be grouped by the type of carrier delivery service provided, i.e., as a city delivery office, a non-city delivery office, or a nondelivery office. If you do not confirm, please explain.
- b. Please provide the number of contract stations in each group referred to in part a. above.
- c. Please provide, and file as a library reference, a file containing data for each of the past five fiscal years on
 - i. the number of contract stations by CAG,
 - ii. the number of post office boxes by box size in contract stations by CAG, and
 - iii. the total amount of Postal Service payments to contractors for contract stations with post office boxes by CAG.

OCA/USPS-T24-74. Please refer to your testimony at page 20, line 8.

- a. Please confirm that the cost of post office boxes located in contract stations is not included in the TYBR "Total Volume-Variable Costs" of \$607,734,000. If you do not confirm, please explain.
- b. Please confirm that the cost of post office boxes located in contract stations is treated as an institutional cost. If you do not confirm, please explain.

OCA/USPS-T24-75. Please refer to your testimony at page 16, Table 8.

- a. Please confirm that, to the extent that post offices vary from year to year in the type of carrier service provided, the number of post office boxes in each fee group would change. If you do not confirm, please explain.
- b. Please confirm that where post offices vary from year to year in the type of carrier service provided, and the number of post office boxes in each fee group change as a result, the Postal Service changes the post office box fees. If you do not confirm, please explain.
- c. Please explain how and when the Postal Service changes post office box fees for boxes that are placed in a new fee group where such boxes are located in post offices that vary from year to year in the type of carrier service provided.

OCA/USPS-T24-76. Please refer to your response to OCA/USPS-T24-60a. Is it your testimony that there will 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 this is not your testimony, please state the changes in Space Support and Space Provision costs resulting from the decrease in the number of boxes and show their derivation.

OCA/USPS-T24-77. Please refer to your testimony at page 20, line 6, and the following table which shows the development of attributable costs for the "Space Provision" category.

FY98 TYBR ACCRUED AND ATTRIBUTABLE SPACE
PROVISION COSTS 1/

COST SEGMENT AND COMPONENT	TOTAL ACCRUED (\$1,000)	ATTRIBUTABLE TO POST OFFICE BOXES (\$1,000)
	[1]	[2]
C/S 15.1 Building Occupancy, Rents	\$688,501	\$111,399
C/S 20.3 Bldg & Leasehold Depreciation	\$581,680	\$94,115
C/S 20.5 Interest Expense - Bldg & Leasehold (Component 215)	\$362,214	\$17,712
TOTAL SPACE PROVISION	\$1,632,395	\$223,226


Notes and Sources

1/ USPS-T-15, WP E, Table D, for the cost segments listed, except C/S 20.5 Interest Expense, see Table C, at 32.

- 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.

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

Washington, D.C. 20268-0001
September 5, 1997