

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 RICHARD PATELUNAS
(OCA/USPS-T15-14-16)
September 10, 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

GAIL WILLETTE

Director

Office of the Consumer Advocate

Shelley S. Dreifuss

SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T15-14. Please refer to your response to OCA/USPS-T24-60b, redirected to you by Witness Lion. Witness Lion estimates a decrease of 4.99 percent ($14,839,920 / 15,620,769 - 1$) in the number of post office boxes during the test year.

- a. Please identify, and provide citations for, all “components that are used to build the distribution keys for the PESSA costs” that are affected by the decrease in the number of post office boxes during the test year.
- b. Please confirm that, if witness Lion had estimated a 4.99% *increase* in post office boxes during the test year, only the components identified in part a. above would be affected.
 - i. If you do not confirm, please explain, identify the components affected, and show the change in attributable post office box costs in the TYAR. Include citations for all figures used.
 - ii. If you confirm, please explain whether the distribution keys would change.
- c. Please provide the percentage changes for the components identified in part a. above that occur from
 - i. the Base Year 1996 to Test Year Before Rates 1998, and
 - ii. the Test Year Before Rates 1998 to Test Year After Rates 1998.
- d. Please show the changes in attributable post office box costs from the TYBR to the TYAR as a result of the 4.99% decrease in the number of post office boxes during the test year. Please show the development of TYAR attributable post office box costs using the components and distribution keys identified in part a. above.

OCA/USPS-T15-15. Please refer to your response to OCA/USPS-T24-60b, redirected to you by Witness Lion.

- a. Please confirm that the "BY96" post office box percentages in components 1099 (Total Key of Space Components) and 1199 (Total Key of Rental Value Components) are computed as follows.
 - i. Component 1099 (Total Key of Space Components): $8.89\% = 8,886,754 / 100,000,000$
 - ii. Component 1199 (Total Key of Rental Value Components): $9.67\% = 9,669,160 / 100,000,000$
- b. Please confirm that the "TY98AR" post office box percentages in components 1099 (Total Key of Space Components) and 1199 (Total Key of Rental Value Components) are computed as follows.
 - i. Component 1099 (Total Key of Space Components): $8.81\% = 8,814,255 / 100,000,000$
 - ii. Component 1199 (Total Key of Rental Value Components): $9.57\% = 9,568,770 / 100,000,000$
- c. Please provide the "TY98BR" post office box percentages for components 1099 (Total Key of Space Components) and 1199 (Total Key of Rental Value Components).

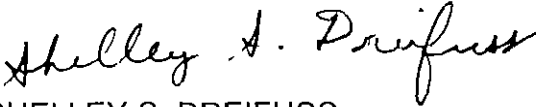
OCA/USPS-T15-16. Please refer to Appendix B of your testimony (USPS-T-5) in Docket No. MC96-3. In Appendix B, page 1, lines 4-7, you state

The presentation is based on the assumption that a percentage decrease in the number of Post Office Boxes in use will be followed by [the] same percentage of mail delivered on the street, either by city delivery carriers or rural carriers.

- a. Please confirm that you made the same assumption in your testimony in Docket No. R97-1, that "a percentage decrease in the number of Post Office Boxes in use will be followed by [the] same percentage of mail delivered on the street." If you do not confirm, please explain. If you do confirm, please provide a citation to the document that implements the assumption.
- b. If the assumption stated in the quote above is no longer applicable to post office boxes in Docket No. R97-1, please explain what has changed in this docket to make the assumption no longer applicable.

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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September 10, 1997