

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-T15-17-18)  
September 11, 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-T15-17. Please refer to your response to OCA/USPS-T24-60b, redirected to you by Witness Lion.


- a. Please confirm that, in the rollforward model, you used growth factors from the Base Year (BY) 1996 to the TY98AR to inflate post office boxes installed and in use. If you do not confirm, please explain. Please show the derivation of the growth factors, and provide citations to any figures used.
- b. Please list, and provide citations to, all cost components to which the growth factors referred to in part a. above were applied.

OCA/USPS-T15-18. The following interrogatory relates to systemwide labor costs.

- a. Please provide, and show the derivation of, the total amount of labor costs for the Postal Service in the TYBR. Please provide citations to any figures used.
- b. Please provide, and show the derivation of, the total amount of labor costs for the Postal Service as a percent of total TYBR attributable costs. Please provide citations to any figures used.
- c. Please provide a list of the Cost Segments and Components that are used to develop the total amount of labor costs for the Postal Service in the TYBR.

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 11, 1997