

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

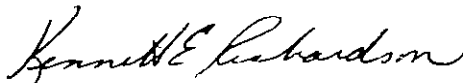
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(OCA/USPS-T5-36-39)
September 12, 1997

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



KENNETH E. RICHARDSON
Attorney

OCA/USPS-T5-36. Please refer to library reference H-1, pages x-xvii.

- a. Please provide each of these tables for the base year.
- b. Please provide the Table 1 accrued cost by CAG for the base year.
- c. Please provide the Table 3 accrued cost by CAG for the base year.
- d. Please identify any accrued cost changes between FY 1996 and BY 1996 for Table 1. Please explain the reasons for any such changes in accrued cost between the FY 1996 and BY 1996 figures.
- e. Please identify any accrued cost changes between FY 1996 and BY 1996 for Table 3. Please explain the reasons for any such changes in accrued cost between the FY 1996 and BY 1996 figures.

OCA/USPS-T5-37. Please refer to your Workpaper B-1, W/S 1.0.3.

- a. Please confirm that the FY 1996 average salary for postmasters in CAGs A-G is \$55,220. If you do not confirm, please explain and provide the correct figure.
- b. Please confirm that the FY 1996 average salary for postmasters in CAGs H-J is \$44,487. If you do not confirm, please explain and provide the correct figure.
- c. Please confirm that the FY 1996 average salary for postmasters in CAGs K-L is \$39,309. If you do not confirm, please explain and provide the correct figure.
- d. Please confirm that the FY 1996 average salary for "Postmasters, No City Delivery" is \$12,349. If you do not confirm, please explain and provide the correct figure.

OCA/USPS-T5-38. Please refer to your WP B W/S 1.0.3, page 4. This sheet summarizes information for postmasters for offices with no city delivery.

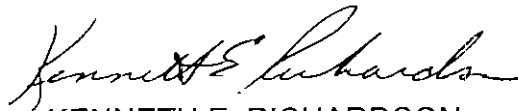
- a. Please confirm that these postmasters are for the Fee Group E offices in witness Lion's testimony. If you do not confirm, please explain all differences between your definition of offices with no city delivery and Fee Group E offices.
- b. Please confirm that all Fee Group E offices with postmasters are covered by these postmaster costs. If you do not confirm, please explain where postmaster costs for the other Fee Group E offices would be summarized.
- c. Are there postmaster costs reflected in this sheet that are not associated with offices offering post office boxes? Please explain.

OCA/USPS-T5-39. Please refer to Attachment 1 to your response to

OCA/USPS-T5-11-13. This response shows a total of $3606+4723 = 8329$ postmasters on the rolls for CAGs H and J at the end of FY 1996. At page 2 of your w/s 1.0.3, the total number of CAGs H and J postmasters is shown to be 8354. Please explain why these two postmaster figures should differ.

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.

A handwritten signature in cursive script that reads "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
September 12, 1997