BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

SEP 12 3 22 PM '97

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 SUSAN W. NEEDHAM
(OCA/USPS-T39-19-20)
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

Shelly J. Dreifuss SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T39-19. Please refer to Docket No. MC96-3, rebuttal testimony of witness Taufique (USPS-RT-2), at page 14.

- Witness Taufique states, "The Postal Service acknowledges that a 'one price fits all' approach may not be the most efficient method of pricing post office boxes."
 Please confirm that this statement continues to reflect the views of the Postal Service. If you do not confirm, please explain.
- b. In Docket No. R97-1, please explain how the Postal Service has reduced its reliance on a "one price fits all" approach in developing fees for post office boxes.
- c. In Docket No. R97-1, please explain how the post office box fee proposal has taken differences in costs and demand into account.

OCA/USPS-T39-20. Please refer to Docket No. MC96-3, rebuttal testimony of witness Taufique (USPS-RT-2), at page 14. Witness Taufique states,

A comprehensive consideration of the demand, supply, and cost differences of post office boxes could evolve into local adjustments to prices at each facility depending upon market factors.

- a. If "local adjustments to prices at each facility" would present administrative burdens to the Postal Service, what options short of local adjustments would reduce Postal Service reliance on a "one price fits all" approach to pricing post office boxes.
- b. For any options identified in response to part a. above, please explain whether and how those options were addressed in the Postal Service's post office box fee proposal in Docket No. R97-1.

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 12, 1997