

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
(OCA/USPS-81-86)
September 19, 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-81. Please refer to the response to OCA/USPS-T5-11-13, Attachment 1, which provides for FY 1996 the "Total" year-end number of USPS employees of 875,352. For FY 1996, please provide the year-end number and proportion of employees for each craft that comprise the "Total" figure of 875,352.

OCA/USPS-82. Please refer to the response to OCA/USPS-T5-11-13, Attachment 1, which provides for FY 1996 the "Total" year-end number of USPS employees of 875,352. For FY 1996 for each CAG, please provide the year-end number and proportion of employees for each craft that comprise the "Total" figure of 875,352.

OCA/USPS-83. For FY 1996, please provide the average annual cost per employee for each craft listed in response to OCA/USPS-81 above.

OCA/USPS-84. For FY 1996 for each CAG, please provide the average annual cost per employee for each craft listed in response to OCA/USPS-82 above.

OCA/USPS-85. For FY 1996 for each CAG, please provide the average annual cost per employee for each Cost Segment.

OCA/USPS-86. Please refer to the response to OCA/USPS-T5-11, where it states that "USPS personnel databases do not contain cross-reference information on CAG and salary levels." Please also refer to LR-H-1, Table A-1.

- a. Please confirm that the total annual salaries for postmasters are reported by finance number. If you do not confirm, please explain.
- b. Please confirm that the total annual wages for clerks are reported by finance number. If you do not confirm, please explain.
- c. Please confirm that the total annual wages for mailhandlers are reported by finance number. If you do not confirm, please explain.
- d. Please confirm that the total annual wages and/or salaries for supervisors are reported by finance number. If you do not confirm, please explain.
- e. Please confirm that in addition to total annual salaries and wages, other compensation and benefit expenses for the employee crafts referred to in parts a. - d. above are reported by finance number. If you do not confirm, please explain.
- g. Please confirm that total annual salaries and wages and other compensation and benefit expenses for employee crafts other than those referred to in parts a. - d. above are reported by finance number. If you do not confirm, please explain.
- h. Please confirm that expense account data are reported by finance number. If you do not confirm, please explain.
- i. Please confirm that cost or expense data is reported by finance number and that the finance number can be associated with a CAG. If you do not confirm, please explain. If you confirm, please provide the cost/expense figures in Appendix A of LR-H-1 by CAG.

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, reading "Kenneth E. Richardson".

KENNETH E. RICHARDSON
Attorney

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