

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS LION
(OCA/USPS-T24-74(b))

The United States Postal Service hereby provides the response of witness Patelunas to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T24-74(b), filed on September 5, 1997, and redirected from witness Lion.

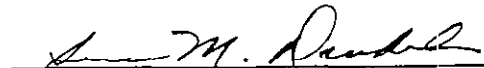
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
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September 19, 1997

Response of United States Postal Service Witness Patelunas
to Interrogatories of
Office of Consumer Advocate
(Redirected from Witness Lion, USPS-T24)

Revised
9/19/97

OCA/USPS-T24-74. Please refer to your testimony at page 20, line 8.

a. Please confirm that the cost of post office boxes located in contract stations is not included in the TYBR "Total Volume-Variable Costs" of \$607,734,000. If you do not confirm, please explain.

b. Please confirm that the cost of post office boxes located in contract stations is treated as an institutional costs. If you do not confirm, please explain.

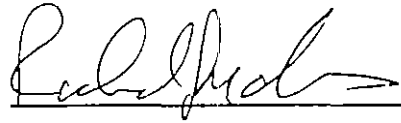
OCA/USPS-T24-74 Response:

a. Part a is answered by Witness Lion, USPS-T24.

b. It is confirmed that the cost of post office boxes located in contract stations is treated as non-volume variable.

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in cursive script, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 9/19/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

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September 19, 1997