

DOCKET SECTION

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
FOLLOW-UP INTERROGATORIES TO
UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T24-94-95)
September 23, 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-T24-94. Please refer to your response to OCA/USPS-T24-71d, and Tables 5 and 6B.

- a. Please confirm that the “85,557 post office box possible deliveries located at contract stations” represents the number of post office boxes installed at contract stations. If you do not confirm, please explain.
- b. Please confirm that the DSF can identify the total number of post office boxes in contract stations by CAG. If you do not confirm, please explain. If you do confirm, please provide the total number of post office boxes in contract stations by CAG.
- c. Please confirm that all the “85,557 post office box possible deliveries located at contract stations” are from the “Non-city Carrier Delivery Group.” If you do not confirm, please explain.
 - i. Please provide the total number of post office boxes in contract stations by Delivery Group.
 - ii. Please provide the total number of post office boxes in contract stations by Delivery Group by CAG.
- d. In Table 6B, please confirm that the total figure of 305,134 in column “E-2” can be calculated as follows: $0.06 * 0.90 * 5,650,638$, where 0.06 represents the percent of contract stations administered by Non-city Delivery Offices and 0.90 the percent of customers ineligible for carrier delivery service from Table 5, and 5,650,638 the total number of boxes in the Non-city Delivery Group from Table 4. If you do not confirm, please explain and provide the correct figures.

- e. In Table 6B, please confirm that for column "E-2," the total figure of 305,134 represents the total number of boxes in use at contract stations in Fee Group E from Fee Group D. If you do not confirm, please explain.
- f. Please reconcile the difference between the figure of 85,557 in part a. above and the figure of 305,134 in part e. above, and explain how the number of boxes in use at contract stations in Fee Group E can exceed the total number of post office boxes installed at all contract stations.


OCA/USPS-T24-95. Please refer to your response to OCA/USPS-T24-73b-c.

- a. In reference to part b. of your response, please provide
 - i. a date for the data source used to derive the number of contract stations by delivery group,
 - ii. the name of the SAS program used to produce the information in part b.,
 - iii. the electronic data input file, if not already provided as a library reference, and
 - iv. a description of all variables to the input files.
- b. Please confirm that the average number of post office boxes installed per contract station is approximately 21 (85,557 boxes installed / 4,132 contract stations). If you do not confirm, please explain.
- c. Please explain why the total number of contract stations of 4,132 in part b. of your response does not match the total of contract stations for any year in part c. of your response.

- d. Please explain why you utilized the Address List Management System (ALMS) rather than the DSF to produce the number of contract stations by CAG. Please describe the ALMS, its use by the Postal Service, and the types of data available from it.

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 23, 1997