

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

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS PATELUNAS TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS ALEXANDROVICH
(OCA/USPS-T5-27-29)

The United States Postal Service hereby provides responses of witness Patelunas to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-T5-27-29, filed on September 9, 1997, and redirected from witness Alexandrovich.

Each 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



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September 23, 1997

**Response of United States Postal Service Witness Patelunas
to Interrogatories of
Office of the Consumer Advocate
(Redirected from Witness Alexandrovich, USPS-T-5)**

OCA/USPS-T-5-27. Please list all BY 1996 cost segments and components (other than segment 3) for which the level of attribution is determined in whole or in part by the total segment 3 attribution level, or by the attribution level of a segment 3 component. In each case, indicate which component is used or whether the segment 3 total is used.

OCA/USPS-T-5-27 Response:

Attachment I to this response provides all components, other than segment 3, whose level of volume variability or distribution of volume variable costs, is dependent on segment 3 (in whole or in part). Attachment I lists the dependent components in column 1, lists the title of these components in column 2, describes how each of the components in column 1 is affected by a part or the whole of segment 3 in column 3, and shows the workpaper and page source for the listings in columns 1-3. Attachment I covers all of the documentation in workpapers A and B, and this information is already available to any of the parties for their use.

**Response of United States Postal Service Witness Patelunas
to Interrogatories of
Office of the Consumer Advocate
(Redirected from Witness Alexandrovich, USPS-T-5)**

OCA/USPS-T-5-28. Please list all BY 1996 cost segments and components (other than segment 3) for which the attributable costs are distributed (in whole or in part) to the classes and subclasses according to the distribution of costs for segment 3 totals.

OCA/USPS-T-5-28 Response:

See my response to OCA/USPS-T5-27, redirected from Witness Alexandrovich,
USPS-T-5.

Response of United States Postal Service Witness Patelunas
to Interrogatories of
Office of the Consumer Advocate
(Redirected from Witness Alexandrovich, USPS-T-5)

OCA/USPS-T-5-29. Please list all BY 1996 cost segments and components (other than segment 3) for which the attributable costs are distributed (in whole or in part) to the classes and subclasses according to the distribution of costs for one of the segment 3 components. In each case, indicate which component is used to distribute the attributable costs.

OCA/USPS-T-5-29 Response:

See my response to OCA/USPS-T5-27, redirected from Witness Alexandrovich, USPS-T-5.

Component	Component Title	Distribution Key	Sources
42	CAG K Clerks	Subclasses distributed on Component 35	WP B W/S 4.1.1
4	Supv. Direct Labor and Overhead	Distributed on Component 35	WP A-2 18.1
7	Supv. Window Services	Distributed on Component 35	WP A-2 18.1
9	Supv. Time & Attendance	Distributed on Component 525 All Salaries key (exc. CS2 T&A and E&LR, CS3 T&A)	WP A-2 20.1
28	Employee & Labor Relations	Distributed on Component 525 All Salaries key (exc. CS2 T&A and E&LR, CS3 T&A)	WP A-2 28.1
32	Gen Supv. Collection & Delivery	Distributed on Component 40 and CS 6&7 exc. CAG K	WP A-2 28.1
676	Supv. QC/Rev Protection	Distributed on Component 295	WP A-2 30.1
678	Joint Supv. Clerks & Carriers	Mail Processing and Specific Fixed Total Distributed on CS 3 excluding T&A and CS 6&7 excluding CAG K	WP A-2 30.1
75	Postal Operating Equipment	Distributed on Component 1258 of which 1258 is part Portion of Component 1258 is Component 35	WP A-2 62.1 WP A-3 82.1
199	Replaced Annual Leave	Distributed on Component 526 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	WP A-2 124.1
200	CSRS Current	Distributed on Component 526 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	WP A-2 124.1
201	CSRS Prior	Distributed on Component 526 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	WP A-2 124.1
204	Workers' Comp	Distributed on Component 526 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	WP A-2 126.1
944	Office Factor	Distributed partially on CS 3 Admin, T&A and Other Distributed on All Salaries key, exc. HQ & Region	WP A-3 16.1 WP A-3 16.1
947	Employee Facilities Factor	Distributed on Component 40	WP A-3 28.1
1001	Window Service Space	Distributed on Component 66	WP A-3 30.1
1010	Claims & Inquiry Space	Distributed on Component 944	WP A-3 42.1
1044	Office Space	Distributed on Component 947	WP A-3 42.1
1047	Employee Facilities Space	Distributed on Component 35	WP A-3 46.1
1052	Mail Transport Equip Centers	Distributed on Component 1001, 1010, 1044, 1047 and 1052	WP A-3 46.1
1099	Total Space Key	Distributed on Component 40	WP A-3 48.1
1101	Window Service Rental		

Component	Component Title	Distribution Key	Sources
1110	Claims & Inquiry Rental	Distributed on Component 66	WP A-3 48.1
1144	Office Space Rental	Distributed on Component 944	WP A-3 62.1
1147	Employee Facilities Rental	Distributed on Component 947	WP A-3 62.1
1152	Mail Transport Equip Centers Rental	Distributed on Component 35	WP A-3 66.1
1199	Total Rental Key	Sum including comps: 1001, 1010, 1044, 1047 and 1052	WP A-3 68.1
1250	Mail Transport Equip Centers	Distributed on Component 35	WP A-3 82.1
1259	Total Key	Includes Component 1250	WP A-3 82.1
1280	Mail Transport Equip Centers	Distributed on Component 35	WP A-3 90.1
1289	Total Key	Includes Component 1280	WP A-3 90.1
428	T & A Supervision	Distributed on Component 527 All Salaries	WP A-4 6.1
427	Employee and Labor Relations	exc. CS 2 T&A and E&LR and CS3 T&A PESSA distributed on Component 527 All Salaries	WP A-4 6.1
429	Employee and Labor Relations	exc. CS 2 T&A and E&LR and CS3 T&A PESSA distributed on Component 527 All Salaries	WP A-4 8.1
74	Cleaning & Protection Personnel	PESSA distributed on Component 1099	WP A-4 10.1
81	Contract Cleaners	PESSA distributed on Component 1099	WP A-4 10.1
79	Plant & Building Equipment	PESSA distributed on Component 1099	WP A-4 10.1
165	Rents	PESSA distributed on Component 1199	WP A-4 12.1
298	Fuel & Utilities	PESSA distributed on Component 1199	WP A-4 12.1
297	Custodial & Building	PESSA distributed on Component 1099	WP A-4 14.1
194	USPS Protection Force	PESSA distributed on Component 1099	WP A-4 16.1
432	CSRS Current	PESSA distributed on Component 433 All Salaries Key	WP A-4 18.1
434	CSRS Prior	and Personnel costs from CS 13, 16, 18 and 19 PESSA distributed on Component 433 All Salaries Key	WP A-4 18.1
435	CSRS Summation	Includes Components 432 and 434 and Personnel costs from CS 13, 16, 18 and 19	WP A-4 18.1
208	Retiree Health Benefits	PESSA distributed on Component 433 All Salaries Key	WP A-4 20.1
71	Annuitant Life Insurance	and Personnel costs from CS 13, 16, 18 and 19 PESSA distributed on Component 433 All Salaries Key	WP A-4 20.1
1435	Annuitant COLA/Principal	PESSA distributed on Component 433 All Salaries Key	WP A-4 20.1

Component	Component Title	Distribution Key	Sources
436	Workers' Comp Current	WP A-4 PESSA distributed on Component 433 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	20.1
453	Unemployment Compensation	WP A-4 PESSA distributed on Component 433 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	22.1
438	Holiday Leave Variance	WP A-4 PESSA distributed on Component 433 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	22.1
440	Replaced Annual Leave	WP A-4 PESSA distributed on Component 433 All Salaries Key and Personnel costs from CS 13, 16, 18 and 19	22.1
296	Imputed Bidg & Leasehold	WP A-4 Distributed on Component 1199	30.1
420	Adjusted Total Bidg & Leasehold	WP A-4 Includes Component 296	30.1
454	Total Depreciation	WP A-4 Includes Component 296	30.1
587	Interest for Equip, Land/Bldg & Vehicles	WP A-4 Distributed on Component 296	32.1
1436	Retirement Interest	WP A-4 Distributed on Component 433 All Salaries	32.1
283	Adjusted Total Interest	WP A-4 Includes Components 587 and 1436	32.1

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", written over a horizontal line.

Dated: 9/23/97

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.



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