

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 DEGEN TO
INTERROGATORY OF TIME WARNER INC.
(OCA/USPS-T12-34)

The United States Postal Service hereby provides the response of witness Degen to the following interrogatories of Time Warner Inc.: TW/USPS-T12-34, filed on September 9, 1997.

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


Eric P. Koetting

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September 23, 1997

**Response of United States Postal Service Witness Degen
to Interrogatories of Time Warner, Inc.**

TW/USPS-T12-34. Please refer to your direct testimony in Docket No. MC95-1(USPS-T-5), Exhibit A ("Carl G. Degen: Resume"), at 2, which lists the following among your "Professional Papers".

United States Postal Service Measures of Output, Input, and Total Factor Productivity, 1963-1982," February 1984, (with D. C. Christensen, L. R. Christensen, and P. E. Schoech).

"United States Postal Service Measures of Real Output, Input, and Total Factor Productivity, 1963-1984" October 1985, (with D. C. Christensen, L. R. Christensen, and Phil Schoech).

"United States Postal Service econometric Analysis of USPS Structure of Production and Total Factor Productivity, 1963-1983," November 1984, (with D. C. Christensen, L. R. Christensen, and P. E. Schoech).

"United States Postal Service Quarterly Real Output, Input, and Total Factor Productivity, 1982 1st Quarter Through 1986 1st Quarter," February 1986, (with D. C. Christensen, L. R. Christensen, and P. E. Schoech).

"United States Postal Service Productivity Budgeting Model Users Manual," June 1986.

"Total Factor Productivity at the MSC Level: Results for 1985, " September 1986, (with D. C. Christensen, L. R. Christensen, and P. E. Schoech).

"TFP Presentation to Budgeting Group", December 3, 1992, (with D. C. Christensen, and P. E. Schoech).

"Performance Analysis of Processing and Distribution Facilities: Sources of TFP Improvement," February 22, 1994, (with D. C. Christensen, K. L. Ehlinger, and P. E. Schoech).

**Response of United States Postal Service Witness Degen
to Interrogatories of Time Warner, Inc.**

- a. Please provide copies of the papers listed above in the form of a library reference.
- b. Please list any other papers relating to Postal Service productivity of which you are an author or which were prepared under your supervision, whether prior or subsequent to the filing of your testimony in MC95-1, and please provide copies of these papers in the form of a library reference.

TW/USPS-T12-34. Response.

- a. The requested papers have been filed as LR-H-272. In a couple instances the dates differ slightly from those requested because the report was updated or revised and we did not retain the earlier version in our files.
- b. I was an author or supervised work on the following reports regarding Postal Service productivity. These have also been filed as part of LR-H-272.

"United States Postal Service Capital Stock Estimates, 1962-1982", Revised March 1983, (D.C. Christensen, L.R. Christensen, C.G. Degen, and P.E. Schoech).

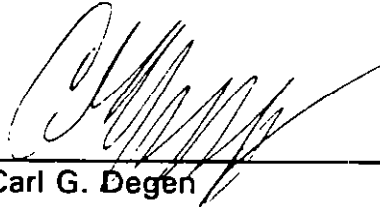
"USPS Annual Total Factor Productivity Methodology", January, 1988, (Laurits R. Christensen Associates, Inc.).

"USPS Quarterly Total Factor Productivity Methodology", A Report to Charles Guy, Director, Office of Economics, January, 1988, (Laurits R. Christensen Associates, Inc.).

"United States Postal Service Total Factor Productivity Data Base Feasibility Study", August 16, 1983, (D.C. Christensen, L.R. Christensen, C.G. Degen, and P.E. Schoech).

DECLARATION

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

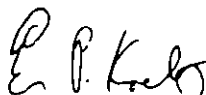


Carl G. Degen

Date: 9-22-97

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.



Eric P. Koetting

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