

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T5-33)

The United States Postal Service hereby provides the response of witness Alexandrovich to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T5-33, filed on September 11, 1997. An objection to interrogatories OCA/USPS-T5-30, 31, 32, 34 and 35 was filed on September 22, 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



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September 25, 1997

Response of United States Postal Service Witness Alexandrovich  
to  
Interrogatories of OCA

**OCA/USPS-T5-30.** If the mail processing variability estimates for MODS, non-MODS offices, or BMCs were to be modified, please identify all portions of your workpapers which would have to be modified.

**Response to OCA/USPS-T5-30**

An objection has been filed to this interrogatory.

Response of United States Postal Service Witness Alexandrovich  
to  
Interrogatories of OCA

**OCA/USPS-T5-31.** Suppose that technical corrections were made to several of the variability estimates provided to witness Degen, and the costs of library reference H-146 had to be revised. Please indicate all inputs that you receive from witness Degen that would be affected by such a change.

**Response to OCA/USPS-T5-31**

An objection has been filed to this interrogatory.

Response of United States Postal Service Witness Alexandrovich  
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Interrogatories of OCA

**OCA/USPS-T5-32.** Please identify all inputs to your workpapers that you received from witness Degen's costing testimony and programs. For each of these inputs, please provide citations to the portions of your workpapers, testimony, and library references where they are used.

**Response to OCA/USPS-T5-32**

An objection has been filed to this interrogatory.

Response of United States Postal Service Witness Alexandrovich  
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Interrogatories of OCA

**OCA/USPS-T5-33.** Please refer to Attachment 1 to OCA/USPS-T5-11-13. This attachment shows the year end number of clerks, mailhandlers, supervisors, postmasters, and total employee complement by CAG for each of the past five years.

- a. Please provide definitions of CAGs M-Y for FY 1992 and FY 1993.
- b. Please explain why CAGs M and O-Y disappear after FY 1993 and what became of the employees associated with those CAGs after FY 1993.
- c. Please explain why the total complement for the lowest CAG group (N) in FY 1994 drops sharply from the lowest CAG group (M-Y) in FY 1993.
- d. Please explain how the CAG M and CAG O-Y employees in FY 1993 are reflected in the FY 1994-1996 tables of employee complements.
- e. Are all CAG K clerk salaries included in cost segment 4? If not, please explain and provide the proportion of CAG K clerk salaries included in cost segment 4.
- f. Please explain what cost segment includes the CAG L clerk costs.
- g. Please list all crafts or other categories of employees that comprise the FY 1992 and 1993 CAG M-Y "TOTAL USPS" employee counts.
- h. Please list all crafts or other categories of employees that comprise the FY 1994-96 CAG N "TOTAL USPS" employee counts.
- i. Please explain why there are CAG N supervisors only for two years, FY 1994 and FY 1995.

**Response to OCA/USPS-T5-33**

- a. The definitions of all CAG codes can be found in Handbook F-8, *General Classification of Accounts*, filed in this proceeding as LR-H-237. CAGs M through Y are defined as follows:

<b>CAG</b>	<b>Purpose</b>
M	Miscellaneous - Headquarters-Related Field Sites
N	Area
R	Rural
S	Inspection Service - Field
U	Information Service Center
W	Headquarters
Y	Maintenance Technical Support Center

Response of United States Postal Service Witness Alexandrovich  
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**Response to OCA/USPS-T5-33 (cont.)**

- b-d. The data for CAG groupings M, S, U, and W were inadvertently left out of the original Attachment 1 to OCA/USPS-T5-11-13. Please see the revised Attachment 1 filed today. I have also provided a supplemental Attachment 1 to OCA/USPS-T5-11-13 which shows paid employees rather than employees on roll.
- e. Yes.
- f. It is my understanding that the few clerks listed in CAG L offices most likely represent clerks who are serving as officers-in-charge of CAG L offices. To the extent that my understanding of this issue is correct, these costs should be included in segment 1 costs.
- g. No craft employees are included in the CAG M-Y employee counts for FY 1992 and 1993. The employees in these CAGs are simply categorized as either bargaining or non-bargaining.
- h. No craft employees are included in the CAG N employee counts for FY 1994-1996. The employees in this CAG are categorized as Professional/Admin/Technical, Supervisor/Manager, and bargaining/non-bargaining.
- i. In FY 1994 there are a total of 4 supervisors, and in FY 1995 a total of 3 supervisors, in CAG N offices. I have no explanation for why there are none in FYs 1992, 1993, and 1996.

Response of United States Postal Service Witness Alexandrovich  
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**OCA/USPS-T5-34.** Please refer to library reference H-1, Table A-1.

- a. Please break down the numbers appearing in the "TOTAL" row by CAG. If this breakdown is not available, please explain.
- b. For each accrued cost in Table A-1, please provide a breakdown by CAG. If this breakdown is not available, please explain. Please provide this information as an Excel spreadsheet file.

**Response to OCA/USPS-T5-34**

An objection has been filed to this interrogatory.

Response of United States Postal Service Witness Alexandrovich  
to  
Interrogatories of OCA

**OCA/USPS-T5-35.** Please refer to library reference H-1, Table A-2.

- a. Please break down each "SEGMENT TOTAL" by CAG. If this breakdown is not available, please explain.
- b. For each number appearing in the column "Accrued Costs," please provide a breakdown by CAG. If this breakdown is not available, please explain. Please provide this information as an Excel spreadsheet file.

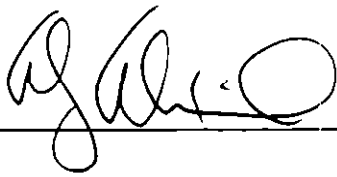
**Response to OCA/USPS-T5-35**

An objection has been filed to this interrogatory.



## DECLARATION

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



A handwritten signature in black ink, appearing to read "Joe Alexandrovich", is written over a horizontal line.

Dated: 9/25/97

## 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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