

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 ALEXANDROVICH
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE AND
MOTION FOR LATE ACCEPTANCE
(OCA/USPS-T5-36(a) and (d)-(e), AND 37-39)

The United States Postal Service hereby provides responses of witness Alexandrovich to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T5-36(a) and (d)-(e) and 37-39, filed on September 12, 1997. An objection to interrogatories OCA/USPS-T5-36(b) and (c) was filed on September 22, 1997. The Postal Service moves that these responses be accepted one business day late. The press of other discovery resulted in the response being ready too late to be copied and filed on the due date.

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 29, 1997

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

OCA/USPS-T5-36. Please refer to library reference H-1, pages x-xvii.

- a. Please provide each of these tables for the base year.
- b. Please provide the Table 1 accrued cost by CAG for the base year.
- c. Please provide the Table 3 accrued cost by CAG for the base year.
- d. Please identify any accrued cost changes between FY 1996 and BY 1996 for Table 1. Please explain the reasons for any such changes in accrued cost between the FY 1996 and BY 1996 figures.
- e. Please identify any accrued cost changes between FY 1996 and BY 1996 for Table 3. Please explain the reasons for any such changes in accrued cost between the FY 1996 and BY 1996 figures.

Response to OCA/USPS-T5-36

- a. The data to construct these tables is contained in my Exhibit USPS-5A.

The component groupings listed in the left-hand column on pages xii to xvii are the same component groupings that appear in this exhibit.
- b. An objection has been filed to this question.
- c. An objection has been filed to this question.
- d. This information was supplied in response to OCA/USPS-T5-14 and Attachment 1 to that response.
- e. The information contained in the response to OCA/USPS-T5-14 and Attachment 1 to that response, along with the data found in Exhibit USPS-5A can be used to construct a Table 3-type comparison of Base Year and Fiscal Year 1996.

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

OCA/USPS-T5-37. Please refer to your Workpaper B-1, W/S 1.0.3.

- a. Please confirm that the FY 1996 average salary for postmasters in CAGs A-G is \$55,220. If you do not confirm, please explain and provide the correct figure.
- b. Please confirm that the FY 1996 average salary for postmasters in CAGs H-J is \$44,487. If you do not confirm, please explain and provide the correct figure.
- c. Please confirm that the FY 1996 average salary for postmasters in CAGs K-L is \$39,309. If you do not confirm, please explain and provide the correct figure.
- d. Please confirm that the FY 1996 average salary for "Postmasters, No City Delivery" is \$12,349. If you do not confirm, please explain and provide the correct figure.

Response to OCA/USPS-T5-37

- a. Confirmed
- b. Confirmed.
- c. Confirmed.
- d. Almost confirmed. The correct figure is \$12,346.

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

OCA/USPS-T5-38. Please refer to your WP B W/S 1.0.3, page 4. This sheet summarizes information for postmasters for offices with no city delivery.

- a. Please confirm that these postmasters are for the Fee Group E offices in witness Lion's testimony. If you do not confirm, please explain all differences between your definition of offices with no city delivery and Fee Group E offices.
- b. Please confirm that all Fee Group E offices with postmasters are covered by these postmaster costs. If you do not confirm, please explain where postmaster costs for the other Fee Group E offices would be summarized.
- c. Are there postmaster costs reflected in this sheet that are not associated with offices offering post office boxes? Please explain.

Response to OCA/USPS-T5-38

- a. Not confirmed. It is my understanding that Fee Group E in witness Lion's testimony refers to customers, rather than offices, who are ineligible for home delivery. Some of these customers have their boxes in offices which provide carrier delivery, while others maintain boxes in nondelivery offices. See USPS-T24 at 1-2.
- b. Not confirmed. It is my understanding that Fee Group E refers to customers who are ineligible for delivery. Since there are no Fee Group E "offices", there is no Fee Group E category of postmasters.
- c. W/S 1.0.3, page 4 is used in the development of EAS-23 and below postmaster costs. I have no information on the characteristics of the offices which these postmasters serve.

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

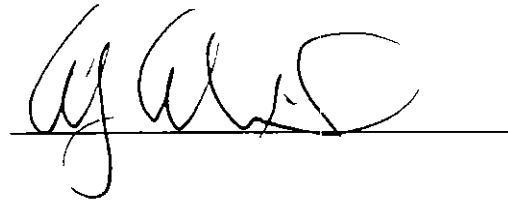
OCA/USPS-T5-39. Please refer to Attachment 1 to your response to OCA/USPS-T5-11-13. This response shows a total of $3606+4723 = 8329$ postmasters on the rolls for CAGs H and J at the end of FY 1996. At page 2 of your w/s 1.0.3, the total number of CAGs H and J postmasters is shown to be 8354. Please explain why these two postmaster figures should differ

Response to OCA/USPS-T5-39

I cannot explain with certainty the apparent minor discrepancy between the two figures.

DECLARATION

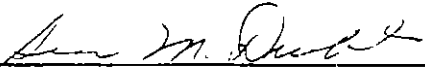
I, Joe Alexandrovich, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

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

Dated: 9/29/97

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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