

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2005)

Docket No. R2005-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MARC A. SMITH (OCA/USPS-T13-1-3)
(May 6, 2005)

Pursuant to Rules 25 through 28 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 interrogatory OCA/USPS-T1-1, dated April 12, 2005, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T13-1. The following interrogatory refers to your testimony at page 9, line 14. Please provide cites for the \$4,052.9 million for FY 2004 facility-related costs. Provide the derivation of all calculated values, cite all sources relied upon, and if a source has not been previously provided in this docket, please provide one.

OCA/USPS-T13-2. On page 9 of your testimony, lines 2 through 4, you indicate that the USPS conducted:

the facility space usage study which provides estimates of the amount of square feet and rents by operation and function for the Postal Service as a whole for the end of FY 1999.

On page 12 of your testimony, lines 9 through 11, you state,

Then, rental costs by operation and function is obtained by the development of rental rates by strata and category based on the 1992 facility study rental rate estimates and multiplying these by the amount of space by operation/function.

- a. Please identify where in your testimony and library references you rely upon the FY 1999 study for square feet and rents. Please specifically cite all references to the FY 1999 study.
- b. Please identify where in your testimony and library references you rely upon the FY 1992 facility study rental rate estimates. Please specifically cite all references to the FY 1992 study.
- c. Please fully explain where and why it was necessary to rely on the FY 1992 facility study for parts of your analysis and then rely on parts of the FY 1999 study for your analysis. In other words, why were you unable to rely solely on the FY 1999 study?

OCA/USPS-T13-3. Please refer to your testimony at page 15, line 14 where you state, “facility space can be directly related to category 15 ‘LDC 15 – RBCS.’”

- a. At page 15, line 14, are you referring to Table 1 of your testimony?
- b. If your response to part a of this interrogatory is affirmative, should your testimony reference at page 15, be to category 15? If not, please fully explain what you are referring to at page 15, line 14.