

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ALEXANDROVICH
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T5-41)

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-T5-41, filed on September 17, 1997. An objection to interrogatory OCA/USPS-T5-42 was filed on September 29, 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


Susan M. Duchek

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October 1, 1997

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

OCA/USPS-T5-41. Please refer to your W/P B-3, W/S 3.2.1., page 2, n. b. Please state the location of the cited program. If it is not already on file with the Commission, please file it.

Response to OCA/USPS-T5-41

The footnote is wrong. The correct citation for column 2, lines 1-43 is W/S 3.2.1.1, column 9. The correct citation for the activities listed in lines 44-63 is USPS-LR-146, pp. IV-9,10. A revised W/S 3.2.1 is being filed today.

Response of United States Postal Service Witness Alexandrovich
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OCA/USPS-T5-42. In response to OCA/USPS-T36-25.i., witness Moeller states that "significant changes in the costing methodology make a direct comparison of [the letter/flat differential between Docket No. MC95-1 and Docket No. R97-1] difficult." OCA is experiencing the same difficulty as the Postal Service's own witness. In order for OCA to make this determination itself, please provide the following information:

- a. For every cost component, list and describe all significant changes to cost attribution methodology in this proceeding.
 - i. Provide a citation for each change listed to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the change has not been documented in any information already on file with the Commission, then provide such documents and give all citations.
 - ii. For each change listed in answer to part a., state whether it has the effect of causing level of attribution for the component to increase, decrease, or remain the same (choose one).
 - iii. If you are unable to provide the answers sought by this subpart, then please redirect the questions (or portions of questions) to witnesses who can provide answers.
- b. For every cost component, list and describe all significant changes to the distribution key(s) used in this proceeding.
 - i. For each, state whether the distribution key change involves substitution of an entirely new distribution key or a significant alteration to an existing key.
 - ii. Provide a citation for each change listed to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the change has not been documented in any information already on file with the Commission, then provide such documents and give all citations.
 - iii. For each change listed in answer to part b., give an additional listing of how each subclass of mail is affected, i.e., for each subclass indicate whether the new (or altered) distribution key causes the particular subclass' share of attributable costs to increase, decrease, or remain the same (choose one).
 - iv. For each effect listed in subpart b.iii., provide a citation to: testimony of a Postal Service witness (by page and line), workpaper (by worksheet, page, column, and row), and/or Library Reference (by page and line), as appropriate. If the effect has not been documented in any information already on file with the Commission, then provide such documents and give all citations.

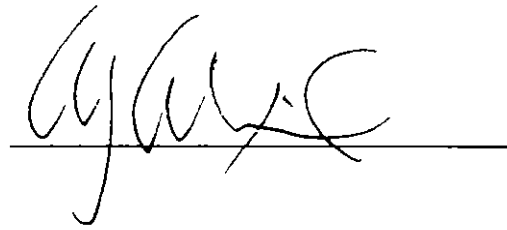
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An objection has been filed to this question.

DECLARATION

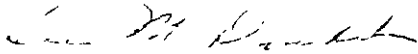
I, Joe Alexandrovich, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

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

Dated: 10 / 1 / 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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