

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 NEEDHAM TO INTERROGATORIES OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T39-21-22)

The United States Postal Service hereby provides responses of witness  
Needham to the following interrogatories of the Office of the Consumer Advocate:  
OCA/USPS-T39-21-22, filed on September 17, 1997.

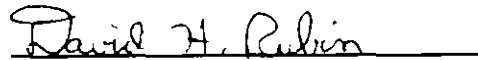
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
October 1, 1997

RESPONSE OF POSTAL SERVICE WITNESS NEEDHAM  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T39-21. Please refer to the Commission's recommended opinion and decision in Docket No. MC96-3, where it states

The Commission endorses the Postal Service's stated goal of offering one free method of delivery to all customers.

PRC Op. MC96-3, at 63.

- a. Please confirm that the Commission's statement quoted above accurately reflects the Postal Service's position in Docket No. MC96-3. If you do not confirm, please explain.
- b. Please confirm that post office boxholders ineligible for carrier delivery service also have the option of general delivery as an alternative form of free delivery. If you do not confirm, please explain.

RESPONSE:

- a) Confirmed that the Postal Service has long held the goal of offering one free method of delivery to customers, and that it continues to do so today. While this is a goal, it is not a service commitment.
- b) Not confirmed. The availability of general delivery is limited. See DMM D930.1.1. The primary group of customers who are both ineligible for carrier delivery and eligible for permanent general delivery service are those subject to the quarter-mile rule. Customers of city delivery offices, regardless of their eligibility for carrier

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OCA/USPS-T39-21(b) Continued

delivery service, lost any entitlement to permanent general delivery service many years ago. At non-city delivery offices, but outside the quarter-mile area, one change effected in implementing Docket No. MC96-3 was to replace customer eligibility for permanent general delivery service with eligibility for Group E box service.

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OCA/USPS-T39-22. Please refer to your response to OCA/USPS-T39-2, wherein you declined to confirm that the Postal Service agrees with the Commission's statement that

The Commission believes it is equitable to offer one post office box at no charge to any customer ineligible for carrier delivery.

Since you do not agree with the Commission's statement, please state and explain the Postal Service's affirmative reasons as to why it is offering another type of free delivery in the form of free post office box service to customers ineligible for carrier delivery.

RESPONSE:

The Postal Service has a goal of offering one free method of delivery to customers, and has recently begun offering free box service as one means to attain that goal. To agree fully with the Commission's statement, however, would imply that the Postal Service has decided that offering one post office box at no charge to any customer ineligible for carrier delivery is appropriate in all circumstances. Other options are available. For example, the Postal Service makes available free general delivery, but not free box service, for customers who are not eligible for carrier delivery because of the quarter-mile rule. The Postal Service is not satisfied that this is necessarily optimal, which is why, as stated in my response to OCA/USPS-T39-2, the Postal Service is studying the circumstances involving quarter-mile customers.

**DECLARATION**

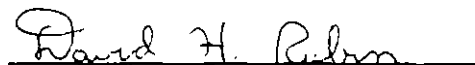
I, Susan W. Needham, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Needham

Dated: October 1, 1997

## 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.

  
David H. Rubin

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