

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
TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS DEGEN
(OCA/USPS-T12-50(C)(ii)-(iv))

The United States Postal Service hereby provides the response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T12-50(c)(ii)-(iv), filed on September 9, 1997, and redirected from witness Degen.

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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October 3, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(REDIRECTED FROM WITNESS DEGEN)

OCA/USPS-T12-50. Please refer to your response (September 2, 1997) to POIR No. 2, question 1.

- a. Attachment 1 presents nominal Standard (B) Library rate (LR) unit costs. Show the derivation of the Segment 14 unit costs for each year, FY 1990 through FY 1996.
 - i. For each figure used in the derivation, provide a citation to source documents used and furnish copies of such documents if they are not already on file with the Commission.
 - ii. State which postal data systems generated the information used to derive the segment 14 unit costs.
- b. Present the same information requested in part a. (including subparts i. and ii.) of this interrogatory for each of the remaining cost segments in Attachment 1 (for LR mail).
- c. In the last paragraph of your response, you conclude that: "Library rate costs, like Classroom, suffer from some instability due to the small volume and the nature of the IOCS sampling procedure." Please address the same issues, i.e.,
 - i. "the small volume [of LR mail] and the nature of the . . . sampling procedure" with respect to the data systems noted in subpart a.ii. of the instant interrogatory (for segment 14);
 - ii. the number of tallies involved in generating segment 14 costs for LR mail;
 - iii. whether tallies "occurr[ed] in proportion to volume" in segment 14 data collection;
 - iv. provide "tallies per dollar of unit cost" for segment 14 costs.

RESPONSE


a-b. Witness Alexandrovich responded to these questions in a response filed September 23.

c.i. Witness Nieto is responding to this question.

cii-iv. Tallies are recorded observations in IOCS. IOCS is not used in development of segment 14 costs.

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.


Anne B. Reynolds

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