

# 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

OFFICE OF THE CONSUMER ADVOCATE  
FOLLOW-UP INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T24-99-101)  
October 21, 1997

Pursuant to sections 25 and 26 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 interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-99. Please refer to your response to OCA/USPS-T24-96b.

- a. Please give the duration of, and provide the beginning and ending dates for, the period over which you assumed the 1.9 percent growth factor would apply.
- b. Please provide the monthly growth rate associated with the 1.9 percent growth factor.

OCA/USPS-T24-100. Please refer to your response to OCA/USPS-T24-96d, which references your response to OCA/USPS-T24-22.


- a. Please provide all studies, reports, analyses or other documents showing how "It was decided to use a more conservative factor of 1.9 percent," if such documents are not already on file with the Commission. Otherwise, please provide page and line citations to documents already on file.
- b. If the decision to use a factor of 1.9 percent was based on discussions with individuals employed by, or under contract with, the Postal Service, please identify those individuals (including position held) and summarize those discussions.

OCA/USPS-T24-101. Please refer to your response to OCA/USPS-T24-96b ("the 'implementation date' [ ] has not been determined"), and your response to OCA/USPS-T24-98, where it states, "If the implementation date were to remain the same, one would need to reduce the growth rate to reflect the fact that the growth between April and September 1997 has already been accounted for."

- a. Please specify the implementation date alluded to in the quoted response to OCA/USPS-T24-98 (or state your assumption with regard to the implementation date).
- b. Please explain how an implementation date that has not been decided can "remain the same."
- c. Please explain the logic of reducing the 1.9 percent growth rate to reflect growth between April and September 1997 if there is no specific assumption as to the implementation date.
- d. Please confirm that, in the absence of a specific assumption as to the implementation date, the 1.9 percent growth factor represents an arbitrary figure. If you do not confirm, please explain.
- e. Please confirm that, in the absence of a specific assumption as to the implementation date, the 1.9 percent growth factor is applicable to a time period of any duration. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
October 21, 1997