

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0000

RECEIVED

OCT 24 4 56 PM '97

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-98-100)

The United States Postal Service hereby provides responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-98-100, filed on October 10, 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



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 24, 1997

Response of United States Postal Service
to Interrogatories of
Office of the Consumer Advocate

OCA/USPS-98. Please refer to Attachment 1 accompanying the response to OCA/USPS-81. Please provide a description of the duties, activities and responsibilities of the employees belonging to each craft identified in Attachment 1.

OCA/USPS-98 Response:

Generally, reference to the following chart provides the location of the requested descriptions:

Title	Segment	USPS-LR-H-9 Section 1 Page	USPS-LR-H-1 Section
Rural Carriers	10	3	10.0 - 10.2
Clerks	3	2	3.0 - 3.3
MH	3	2	3.0 - 3.3
City Carriers	6&7	3	6.0 - 7.5
Prof/Admin/Tech	2	2	2.5
PM/GM/Inst. Head	1	1	1.0 - 1.3
PM Relief	1	1	1.0 - 1.2
Supv/Mgrs.	2	2	2.0 - 2.4
Sp. Del. Msgs.	9	3	9.0 - 9.2
Vehicle Maint.	12	4	12.1
Vehicle Oper.	8	3	8.0 - 8.1
Maint. Service	11	4	11.0 - 11.3
Other Barg.	13, 16, 18	3-6	13.5, 16.2, 18.1
Other Non-Barg.	18	3-6	18.1
Other Temp/Casl.	Various	Cannot be determined	
Other Non-Barg. Temp.	Various	Cannot be determined	

The chart is only generally appropriate because the number of CAG employees by the listed categories does not follow the same format as the segments and components listed in Library References H-1 and H-9. For instance, as explained on page 4 of USPS-LR-H-9, "all personnel costs, including supervision" are included in Cost Segments 11 and 12. The number of all supervisors is included in the "Supv/Mgrs." category on Attachment 1 to OCA/USPS-81-82. As such, this comparison

Response of United States Postal Service
to Interrogatories of
Office of the Consumer Advocate

OCA/USPS-98 Response continued:

is not precise. Additionally, the last four categories listed on the chart above are an amalgam of personnel types that are headquarters and area related and it is impossible to precisely define where they appear in the segments and component, although the citations provided in the chart are the best available.

Response of United States Postal Service
to Interrogatories of
Office of the Consumer Advocate

OCA/USPS-99. Please refer to Attachment 1 accompanying the response to OCA/USPS-81, and the craft, "Maintenance Service."

- a. Please explain how "Maintenance Service" employees relate to Cost Components 11.1.1, 11.1.2, 11.2, and 11.3.
- b. Please explain how "Maintenance Service" employees relate to Cost Component 16.3.1.

OCA/USPS-99 Response:

- a. All of the "Maint. Service" employees shown in Attachment 1 to OCA/USPS-81-82 are included in Cost Segment 11, but the separation into 11.1.1, 11.1.2, 11.2 and 11.3 cannot be made. As noted in the response to OCA/USPS-98, the supervisory costs associated with this maintenance function are included in Cost Segment 11, although the number of these supervisors is included in "Supv/Mgrs." in Attachment 1 to OCA/USPS-81-82.
- b. Component 16.3.1 is for supplies only; there are no personnel costs in this grouping

Response of United States Postal Service
to Interrogatories of
Office of the Consumer Advocate

OCA/USPS-100. Please refer to Attachment 1 accompanying the response to OCA/USPS-81, and the craft, "Maintenance Service."

- a.
 - i. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.1.1. If you do not confirm, please explain.
 - ii. Please identify any other craft employee personnel costs that are reported in Cost Component 11.1.1.
 - iii. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.1.2. If you do not confirm, please explain.
 - iv. Please identify any other craft employee personnel costs that are reported in Cost Component 11.1.2.
 - v. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.3. If you do not confirm, please explain.
 - vi. Please identify any other craft employee personnel costs that are reported in Cost Component 11.3.
- b.
 - i. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 16.3.1. If you do not confirm, please explain.
 - ii. Please identify any other craft employee personnel costs that are reported in Cost Component 16.3.1.
- c. Please identify all other Cost Segments and Components that report "Maintenance Service" employee personnel costs, other than Cost Segments 11 and 16.
- d. What proportion of total "Maintenance Service" employee personnel costs are reported in Cost Segment 11?
- e. What proportion of total "Maintenance Service" employee personnel costs are reported in Cost Segment 16?

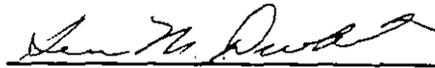
Response of United States Postal Service
to Interrogatories of
Office of the Consumer Advocate

OCA/USPS-100 Response:

- a.
 - i. Part i. is confirmed.
 - ii. There are no other craft employee personnel costs reported in Cost Component 11.1.1.
 - iii. Part iii. is confirmed.
 - iv. There are no other craft employee personnel costs reported in Cost Component 11.1.2.
 - v. Part v. is confirmed.
 - ii. There are no other craft employee personnel costs reported in Cost Component 11.1.3.
- b.
 - i. Part i. is not confirmed. Please see the response to OCA/USPS-99b.
 - ii. Please see the response to OCA/USPS-99b.
- c. Cost Segment 11 reports "Maintenance Service" employee personnel costs.
- d. One hundred percent.
- e. Zero percent.

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
October 24, 1997