

DOCKET SECTION

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

RECEIVED

JAN 22 4 50 PM '98

OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE  
INTERROGATORY TO  
OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW  
(USPS/OCA-T500-29)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatory to Office of the Consumer Advocate witness Callow: USPS/OCA-T500-29.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

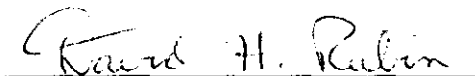
475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
January 22, 1998

**USPS/OCA-T500-29.** Please refer to your testimony at page 48, lines 8 to 10.

- (a) Please confirm that in FY 1996, only 0.329 percent of all weighted tallies for cost segment 3 post office box and caller service costs were mailhandler tallies, while 99.671 percent were clerk tallies. If you do not confirm, please explain why not.
- (b) Please confirm that, using these percentages, one would estimate volume-variable mailhandler costs to be \$235,000, or 0.329 percent of Cost Segment 3 volume-variable post office box and caller service costs of \$71,527,000.
- (c) Do you believe that this \$235,000 estimate or the \$12,039,000 estimate in your testimony is a better estimate for mailhandler costs for post office box and caller service? Please explain your reasoning.

#### **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

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
January 22, 1998