

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

RECEIVED  
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POSTAL RATE COMMISSION  
OFFICE OF THE CLERK  
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE FOLLOW-UP  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE COALITION OF RELIGIOUS PRESS ASSOCIATIONS WITNESS STAPERT  
(USPS/CRPA-T1-11-12)

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 follow-up interrogatories and requests for production of documents to the Coalition of Religious Press Associations witness Stapert: USPS/CRPA-T1-11-12.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L. Reiter

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January 29, 1998

USPS/CRPA-T1-11. Please refer to your response to USPS/CRPA-T1-1b and the testimony of William P. Tayman, Exhibit USPS 9L.

- (a) Confirm that equity was positive as recently as FY 1987 and that most of the negative equity to which you have referred accumulated over the five year period FY 90-94, not over the past 20 years as you stated.
- (b) Please confirm that a negative equity of \$1.4 billion means that the Postal Service's liabilities are greater than its assets by that amount. If you do not confirm please explain your answer. When reviewing the financial statements of a business or other entity such as the Postal Service, would you consider negative equity to be an indicator of financial health or weakness? Please explain your answer fully.

USPS/CRPA-T1-12. Please refer to your response to USPS/CRPA-T1-2. Part (b) of that interrogatory asked you to confirm that the variances from the FY 97 \$636 million net income estimated in this Docket are more relevant to this rate proceeding than variances from the FY 97 \$55 million plan. You answered that both variances may be relevant but did not answer the question as to their relative value. Please confirm that variances from the rate case estimate of \$636 million net income would be more relevant to this proceeding than variances from the plan. If you do not confirm please why explain why.

**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.



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Scott L. Reiter

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January 29, 1998