

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0004

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U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION


Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

ANSWER OF THE OFFICE OF THE CONSUMER ADVOCATE  
TO INTERROGATORY OF UNITED STATES POSTAL SERVICE  
WITNESS: JAMES F. CALLOW (USPS/OCA-T500-36)  
(February 13, 1998)

The Office of the Consumer Advocate hereby submits the answer of James F. Callow to interrogatory USPS/OCA-T500-36, dated January 30, 1998. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

  
SHELLEY S. DREIFUSS  
Attorney  
Office of the Consumer Advocate

ANSWER OF OCA WITNESS JAMES F. CALLOW  
TO INTERROGATORY USPS/OCA-T500-36

USPS/OCA-T500-36. Please refer to your response to interrogatory USPS/OCA-T500-2, where you state that since you do not have cost data for each office, you do not know "*a priori* whether a reasonable basis for grouping offices might have emerged from the data." Please explain specifically what cost data would not provide a reasonable basis for grouping offices based on costs for each office, assuming such costs were available. For example, would not one be able to simply order all offices by costs, and then divide the offices into equally-sized groups, such as quartiles?

A. My response to USPS/OCA-T500-2 was not intended to address whether certain cost data for each office would not provide a reasonable basis for grouping offices. The cost data that would *not* be reasonable could be limitless. Rather, I would be willing to consider relevant post office box cost data for each office as a basis for grouping offices, if such costs were available. Nevertheless, since I did not have cost data for each office, I could not make any statement or determination about the use of office cost data.

In my view, the issue is, What would be a reasonable basis for grouping offices? The question suggests an approach. In the absence of cost data for each office, however, it is not possible to judge whether such an approach is reasonable.

DECLARATION

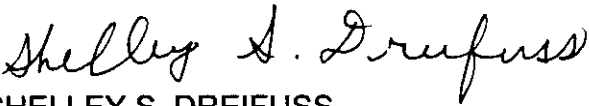
I, James F. Callow, declare under penalty of perjury that the answer to interrogatory USPS/OCA-T500-36 of the United States Postal Service is true and correct, to the best of my knowledge, information and belief.

Executed 2-13-98

James F Callow

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, DC 20268-0001  
February 13, 1998