DOCKET SECTION

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

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Postal Rate and Fee Changes, 1997

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
(OCA/USPS-120-125)
February 17, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits the following

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

KENNETH E. RICHARDSON

Attorney

OCA/USPS-120. Please provide the Postal Service budget numbers for total Postal Service expenses, revenues and volumes, by accounting periods, for FY 1998 of the type which are referenced by the Chief Financial Officer in his earnings expense, revenue and volume comparisons during presentations at public meetings to the Board of Governors.

OCA/USPS-121. Please provide the current Postal Service budget estimates for total Postal Service expenses, revenues and volumes by accounting periods, for FY 1999 comparable to those requested in OCA/USPS-120. Please indicate the assumptions regarding the effective date, if any, of the present rate request in this Docket No. R97-1.

OCA/USPS-122. Please provide the current Postal Service estimate of net income for FY 1998. Please indicate the assumptions regarding the effective date of any rate increase during the period.

OCA/USPS-123. Please provide the current Postal Service estimate of net income for FY 1999. Please indicate the assumptions regarding the effective date of any rate increases and their amount during the period.

OCA/USPS-124. Please refer to Table 53 in witness Tayman's testimony, USPS-T-9 at 42 in which he indicates the prior years' losses on September 30, 1996, were \$5,657,952 and his testimony at Tr. 9/4593 that net income would be applied to reduce the past year losses by a like amount.

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a. Please confirm that the 1997 net income reported in the Postal Service's annual

report of \$1.264 billion reduced the past year losses account by a like amount.

b. Please provide the current account balance for Postal Service prior year losses

and state how it was calculated, including any other adjustments starting with the

balance at the beginning of 1997.

OCA/USPS-125. The Postal Service's Daily News Digest, Thursday, January 22,

1998, includes a portion of the "Friday Report" for January 16, 1998, stating the Postal

Service "is now showing a \$731 billion profit in the first half of their 1998 fiscal year."

Does the Postal Service currently estimate at least a \$731 billion profit in the first half of

its 1998 fiscal year? If not, please explain and state what profit the Postal Service is

currently estimating for the first half of its FY 1998.

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.

KENNETH E. RICHARDSON

Attorney

Washington, D.C. 20268-0001

February 17, 1997