

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
FOLLOW-UP INTERROGATORY TO
OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW
(USPS/OCA-T500-36)

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 interrogatory to Office of the Consumer Advocate witness Callow:
USPS/OCA-T500-36.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin
David H. Rubin

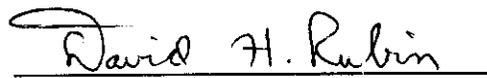
475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -5402
January 30, 1998

POSTAL RATE COMMISSION
DOCKETED
JAN 30 1998
OFFICE OF THE SECRETARY

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?

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