

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-001

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Postal Rate and Fees Changes, 1997

Docket No. R97-1

OFFICE OF THE CLERK

Motion to Accept Late-Filed Response and
Response of ABA/EEI/NAPM to
Interrogatory of Nashua Photo, Inc., *et al.*
(NDMS/ABA/EEI/NAPM-T1-1)

(February 13, 1998)

Pursuant to the Commission's Rules of Practice, American Bankers Association ("ABA"), Edison Electric Institute ("EEI"), and National Association of Presort Mailers ("NAPM") hereby file the response of their witness James A. Clifton to the interrogatory of Nashua Photo, Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc., NDMS/ABA/EEI/NAPM-T1-1. In addition, ABA/EEI/NAPM hereby move for acceptance of said response two days late. The delay was occasioned by difficulties in coordinating the various, and sometimes conflicting, schedules of the individuals concerned.

Respectfully submitted,

American Bankers Association,
Edison Electric Institute, and
National Association of Presort Mailers

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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.

February 13, 1998


R. Brian Corcoran

**RESPONSE OF ABA/EEI/NAPM WITNESS CLIFTON
TO INTERROGATORY OF NDMS**

NDMS/ABA/EEI/NAPM-T1-1

In your testimony, at Technical Appendix C-2, you analyze a proposal which would increase Standard A Regular's cost coverage from **155 percent to 164 percent** (*Id.*, p.2), and add **1.2 cents** to the rates of all piece-rated Standard A Regular Automated and Presort rate categories (*Id.*, p.3) At Technical Appendix D, you analyze a proposal which would increase the Standard A Regular cost coverage from **155 percent to 166 percent** (*Id.*, p. 2), which would add **0.4 cents** to the rates of piece-rated Standard A Regular nonautomated basic letters and flats, and add **1.6 cents** to the rates of all piece-rated Standard A Regular Automated and Presort rate categories (*Id.*, p. 3).

- a. Is it your testimony that the Commission should only consider economic efficiency in evaluating your proposals for Standard A mail?
- b. If not, what factor in 39 U.S.C. Sec. 3622(b) support your proposals to increase Standard A rates? Please explain your answer.
- c. Is it your view that mail preparation requirements for First-Class workshared mail and Standard A mail are comparably burdensome?

RESPONSE

- a. No. See my response to VP-CW/ABA/EEI/NAPM-T1-2, and also note how I define efficiency in my response to VP-CW/ABA/EEI/NAPM-T1-8.
- b. See my response to VP-CW/ABA/EEI/NAPM-T1-2.
- c. See my response to VP-CW/ABA/NNA-T1-1.b. However, I believe that the mail preparation requirements for workshared First-Class mail are still somewhat more burdensome than for Standard A mail, *e.g.*, the former has a 500 piece minimum compared to 200 for the latter; in addition, workshared First-Class mail is subject to 180 day move update requirements in DMM 51.

DECLARATION

I, James A. Clifton, declare under penalty of perjury that the answer to interrogatory NDMS/ABA/EEI/NAPM-T-1-1 of Nashua Photo, Inc., District Photo, Inc., Mystic Color Lab, and Seattle Film Works, Inc. is true and correct, to the best of my knowledge, information and belief.

Executed FEB 13, 98

A handwritten signature in cursive script, appearing to read "James A. Clifton", written over a horizontal line.

James A. Clifton