BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-000 FFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DOUGLAS CARLSON (DFC/USPS-1 and 2)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson, dated July 11, 1997: DFC/USPS-1 and 2.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202)268-2998/FAX: -5402 July 30, 1997

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DOUGLAS CARLSON

DFC/USPS-1.

- a. Is the public interest a guiding principle for the Postal Service when it develops a request for an opinion and recommended decision to change rates, fees, or classifications?
- b. Is the public interest a consideration for the Postal Service when it develops a request for an opinion and recommended decision to change rates, fees, or classifications?
- c. Is the public interest a consideration for the Postal Service when it litigates a request for an opinion and recommended decision to change rates, fees, or classifications?

RESPONSE:

a-c. In accordance with 39 U.S.C. § 3622(a), the Postal Service submits requests for changes in rates, classifications, and fees, when such changes are determined by the Postal Service to be in the public interest.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DOUGLAS CARLSON

DFC/USPS-2.

Does the Postal Service believe that an individual who intervenes on behalf of himself, in a docket involving a request for an opinion and recommended decision to change rates, fees, or classifications may provide an important perspective to the Commission, the Postal Service and other parties on some issues in the case?

RESPONSE:

The Postal Service cannot speak for the Postal Rate Commission or other parties. Whether or not such a perspective would be considered "important" to the Postal Service does not seem to be a matter relevant to whether the rate or fee or classification proposals before the Commission are in accordance with the policies of the Postal Reorganization Act. Nor does such a question seem reasonably calculated to lead to the discovery of admissible evidence.

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.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1145 July 30, 1997