

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DONALD J. O'HARA
(DFC/USPS-T30-1-7)

August 4, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice*, I, Douglas F. Carlson, hereby submit interrogatories to United States Postal Service witness Donald J. O'Hara.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Frank (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,

Dated: August 4, 1997



DOUGLAS F. CARLSON

DFC/USPS-T30-1. Please provide the cost coverage for First-Class Mail letters and First-Class Mail single-piece letters that was approved in Docket No. R94-1.

DFC/USPS-T30-2. Please provide the cost coverage for First-Class Mail cards and First Class Mail single-piece cards that was approved in Docket No. R94-1.

DFC/USPS-T30-3. Please provide the cost coverage for single-piece First-Class Mail letters that the Postal Service is proposing in Docket No. R97-1.

DFC/USPS-T30-4. Please provide the cost coverage for First-Class Mail single-piece cards that the Postal Service is proposing in Docket No. R97-1.

DFC/USPS-T30-5.

a. Please confirm that the rate for mailing a single-piece post card on July 1, 1994, was 19 cents.

b. Please confirm that the rate for mailing a single-piece post card on July 1, 1997, was 20 cents.

c. Please explain your statement at page 26, lines 3-5, that the current case represents "the first overall increase in card rates since Docket No. R90-1."

DFC/USPS-T30-6. Please provide all data reporting the average delivery time for Priority Mail and the percentage of the time in which Priority Mail is delivered in accordance with the Postal Service's two- or three-day service standards. Please provide all background material that would be necessary for a person to understand the data.

DFC/USPS-T30-7. Please refer to your testimony at page 37, lines 9-10. Please confirm that a mailer still can deposit a Parcel Post parcel weighing three pounds in a collection receptacle if the parcel bears metered postage. If you do not confirm, please explain your answer fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

August 4, 1997
Emeryville, California